

SEPA Environmental Impact Statement ADDENDUM

for the

2024 Bullfrog Flats Proposal



prepared by

City of Cle Elum

January 2025

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TABLE of CONTENTS

	<i>Page</i>
CHAPTER 1 – FACT SHEET	
CHAPTER 2 – PROJECT DESCRIPTION	
CHAPTER 3 – UPDATED INFORMATION & ANALYSIS	
A. Natural Environment.....	3.0-1
B. Built Environment	
1. Land Use.....	3.1-1
2. Aesthetics / Light & Glare.....	3.2-1
3. Housing, Population, & Employment.....	3.3-1
4. Cultural Resources.....	3.4-1
5. Parks and Recreation.....	3.5-1
6. Transportation	3.6-1
7. Public Services.....	3.7-1
8. Utilities.....	3.8-1
9. Fiscal Conditions.....	3.9-1
CHAPTER 4 – REFERENCES	
CHAPTER 5 – DISTRIBUTION LIST	
APPENDICES	
A. <i>Air Quality and Noise Assessment Memorandum</i>	
B. <i>Geologic Hazards Requirements</i>	
C. <i>Wetland Buffer Requirements</i>	
D. <i>Transportation Report</i>	
E. <i>Utilities Memorandums</i>	
F. <i>Fiscal Conditions Report</i>	

LIST of FIGURES

<i>Figure</i>	<i>Page</i>
2-1 Vicinity Map	2-2
2-2 2002 UGA Master Site Plan	2-3
2-3 2024 Phasing Plan	2-9
2-4 2024 Master Site Plat	2-10

LIST of TABLES

<i>Table</i>	<i>Page</i>
2-1 Land Use Summary (Buildout)	2-12
3.5-1 Required & Proposed Parks & Recreation Facilities	3.5-1
3.6-1 Existing (2024) Intersection LOS Summary (Summer)	3.6-4
3.6-2 Future Baseline Intersection LOS Summary – Weekday PM Peak Hour (Summer)	3.6-5
3.6-3 Crash Data Summary (2019-2023)	3.6-7
3.6-4 Land Use Summary	3.6-8
3.6-5 Bullfrog Flats Project Trip Generation Summary (Scenario A)	3.6-9
3.6-6 Bullfrog Flats Project Trip Generation Summary (Scenario B)	3.6-9
3.6-7 Intersection LOS Summary – Weekday PM Peak Hour (Summer)	3.6-11
3.6-8 Intersection with Non-Compliant LOS – Weekday PM Peak Hour (Summer)	3.6-12
3.6-9 Roadway LOS Summary (Bullfrog Road)	3.6-13
3.6-10 Roadway LOS Summary (Cle Elum Comp Plan) – Weekday PM Peak Hour	3.6-15
3.6-11 Roadway LOS Summary (Cle Elum Comp Plan) – Friday PM Peak Hour	3.6-16
3.6-12 Roadway LOS Summary (Cle Elum Comp Plan) – Sunday PM Peak Hour	3.6-17
3.6-13 Site Access LOS Summary	3.6-19
3.6-14 Summary of Weekday PM Peak Hour Mitigation Measures and Preliminary Estimated Pro-Rata Share	3.6-21
3.6-15 Future Year Intersection LOS Summary with Mitigation and Site Access Improvements for Bullfrog Flats Project (Scenario A)	3.6-23
3.6-16 Future Year Intersection LOS Summary with Mitigation and Site Access Improvements for Bullfrog Flats Project (Scenario B)	3.6-24
3.7-1 Bullfrog Flats Public Service LOS & Impact Comparison Summary	3.7-2
3.9-1 Revised Project Land Development Program by Type, Scale & Timing	3.9-2
3.9-2 Valuation Assumptions for Major Tax Bases	3.9-3
3.9-3 Summary of Cost Impacts for Cle Elum	3.9-10
3.9-4 Bullfrog Flats Project Scenario 1 – Summary of Revenue Impacts for Cle Elum	3.9-11

3.9-5	Bullfrog Flats Project Scenario 2 – Summary of Revenue Impacts for Cle Elum	3.9-12
3.9-6	Scenario 1 – Surplus/Deficit of Costs & Revenues for Cle Elum	3.9-13
3.9-7	Scenario 1 – Surplus/Deficit of Costs & Revenues for Cle Elum	3.9-14
3.9-8	Summary of Kittitas Hospital District #2 Revenues	3.9-15
3.9-9	Bullfrog Flats Project – Summary of Costs & Revenues for EMS Medic One.....	3.9-17
3.9-10	Bullfrog Flats Project – Summary of Costs & Revenues for Cle Elum Clinic.....	3.9-18
3.9-11	Bullfrog Flats Project – Summary of Costs & Line Revenues for KITTCOM.....	3.9-20
3.9-12	Bullfrog Flats Project – Summary of Costs for the School District.....	3.9-22

Chapter 1

FACT SHEET

FACT SHEET

Name of Project

2024 Bullfrog Flats Proposal

Proponent

Bullfrog Flats LLC

Location

The project site is located in the City of Cle Elum, generally bounded by I-90, Bullfrog Road, SR-903, and the city cemetery.

Environmental Review

In 2002, a State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS) was prepared for the approximately 1,100-acre Bullfrog Flats Urban Growth Area (UGA). Environmental documents were also prepared for subsequent proposals on the same site (Sun Communities 47th North) which also updated the environmental information and analysis in the 2002 EIS. This Addendum for the 2024 Bullfrog Flats Proposal updates the information in the prior documents and adopts the relevant existing documents identified below.

Per the SEPA Rules (WAC 197-11-706), an Addendum is an environmental document used to provide additional information or analysis that does not substantially change the analysis of significant impacts or alternatives in an existing environmental document. The City is following applicable procedures for an addendum per WAC 197-11-625 and for adoption of environmental documents per WAC 197-11-630.

Prior Approvals

The following approvals were granted in 2002 for the Bullfrog Flats Master Site Plan:

- Annexation of the Cle Elum UGA to the City;
- Comprehensive Plan amendment;
- Planned Mixed Use (PMU) zoning final plan;
- Master Site Plan approval; and
- Development Agreement approval.

Proposal

The EIS Addendum evaluates the 2024 Bullfrog Flats Proposal which is intended to be consistent with the 2002 Master Site Plan and Development Agreement and includes the following:

- 1,334 residential units;
- A 7.5-acre site for 50 units of affordable housing;
- 549 acres of open space;
- Park and recreation amenities;
- Areas that were previously dedicated to the City and other entities for public uses; and,
- A 75-acre area for a future business park.

Lead Agency

City of Cle Elum

SEPA Responsible Official

Richard Weinman, Designated SEPA Responsible Official
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Required Approvals and/or Permits

Preliminary analysis indicates that the following approvals and/or permits may be required from agencies with jurisdiction for licensing or permitting. Additional permits/approvals may be identified during the review process associated with specific development projects.

State of Washington

- Dept. of Natural Resources, Forest Practices Permit
- Dept. of Ecology, Construction Stormwater General Permit
- Dept. of Health, Group A Water System Approval
- Dept. of Transportation, Access Permits

Kittitas County

- Access Permits

City of Cle Elum

- Master Plat Approval
- Subdivision Approval
- Boundary Line Adjustment
- Revised Development Agreement Approval
- Grading Permits

- Building Permits
- Mechanical, Electrical, and Plumbing Permits
- Utility Permits

EIS Addendum Authors & Principal Contributors

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- Utilities

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- Air Quality/Greenhouse Gas Emissions, Noise

Transportation Engineering Northwest (TENW)

- Transportation

ECONorthwest

- Fiscal Conditions

Previous Environmental Documents

Per WAC 197-11-706, this document is an Addendum to the 2002 Cle Elum UGA EIS. To meet its environmental review needs, the City is also adopting the following documents, which address the environmental impacts of the approved Bullfrog Flats UGA in view of changed conditions: 2021 Draft EIS/ 2021 Final SEIS and 2023 SEIS Addendum for the *47th North Major Modification*.

Location of Background Information

Background material and supporting documents are available at the offices of:

EA Engineering, Science and Technology, Inc., PBC

600 Stewart Street, Suite 800
Seattle, WA 98101

City of Cle Elum

119 First Street
Cle Elum, WA 98922

Date of Issuance of EIS Addendum

January 15, 2025

There is no comment period for this addendum.

Public Hearing

The Cle Elum Hearing Examiner will conduct a public hearing on the 2024 Bullfrog Flats application Thursday, January 30, 2025 at 6:00 PM at Cle Elum City Hall. Additional information about the proposal is available on the City's website at the web address listed below.

Availability of this EIS Addendum

Notices of Availability of the EIS Addendum have been distributed to agencies, organizations, and individuals noted on the Distribution List. The EIS Addendum can also be reviewed and downloaded from the City's website by following this link:

<https://cleelum.gov/city-services/planning/bullfrog-flats-development/>

Printed versions of the EIS Addendum can be reviewed at:

- **City of Cle Elum City Hall**
119 First Street
Cle Elum, WA 98922
- **Cle Elum Public Library Branch**
302 N Pennsylvania Avenue
Cle Elum, WA 98922

USB drives may be purchased at City of Cle Elum for \$7.00 per thumb drive, plus tax and postage (if mailed). Printed copies can be ordered for the cost of printing, which is estimated at \$50, plus tax and postage.

INTRODUCTION AND PROJECT DESCRIPTION

Section 2

INTRODUCTION AND PROJECT DESCRIPTION

Introduction and Background Information

The proposal addressed in this addendum is the 2024 Bullfrog Flats Proposal (Proposal). The Proposal implements the Master Site Plan and Development Agreement (DA) approved by the City in 2002 for the area referred to as the Bullfrog Flats Urban Growth Area (UGA). The current application includes a master plat, three preliminary plats containing 233 single family lots and 164 townhomes , a boundary line adjustment (BLA), and request to extend the DA for an additional 10 years.

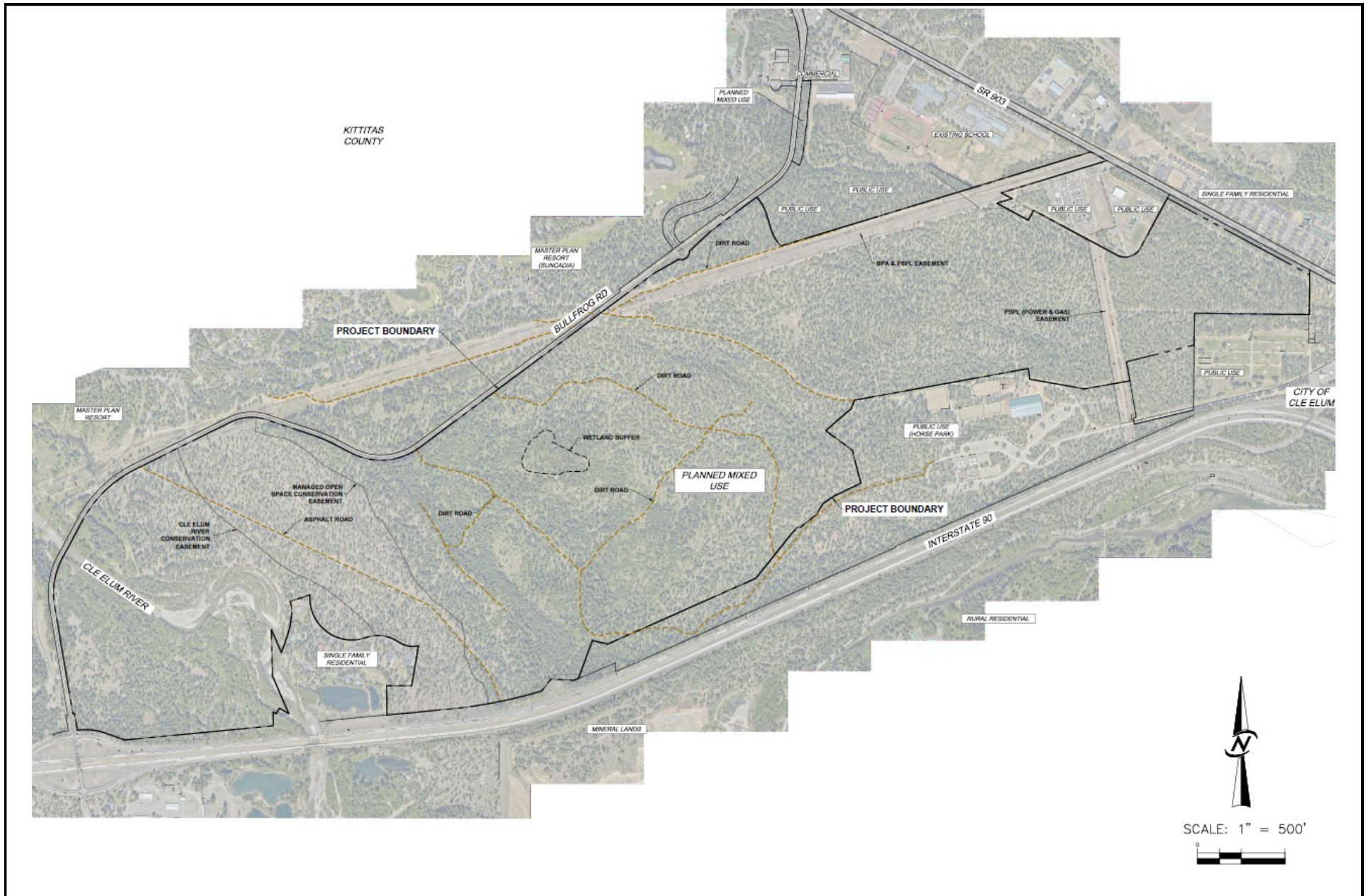
This document, prepared pursuant to the requirements of State Environmental Policy Act (SEPA) (RCW 43.21C and WAC 197-11), is an addendum to the Bullfrog Flats UGA Final Environmental Impact Statement (FEIS), issued in 2002. It also adopts and/or incorporates relevant information from a recent Supplemental EIS (SEIS, 2021) and an addendum to that SEIS (SEIS addendum, 2023) prepared for a different proposal (47° North) on the same site. Both documents contain updated analyses of the Bullfrog Flats UGA project that consider existing conditions on and around the Bullfrog Flats site.

This Addendum to the 2002 EIS is intended to document the City's evaluation of the Bullfrog Flats Project and its conclusion that there are no significant changes to the 2002 master plan included in the 2024 Bullfrog Flats Proposal application, and/or recent changes in background conditions, that could result in probable significant adverse environmental impacts that differ from those analyzed in the 2002 FEIS or the subsequent environmental documents. The Addendum is also designed to help the reader understand the substance and conclusions of the extensive prior, relevant SEPA documentation and to view the current proposal in this context. The SEPA process that the City is following for the 2024 Bullfrog Flats Project is described more completely below.

Prior Permitting and Environmental Documentation

In 2002, the City of Cle Elum approved a Master Site Plan and DA for the 1,100-acre Bullfrog Flats UGA, proposed by Trendwest Resorts, the developer of Suncadia. Additional actions associated with the Bullfrog Flats UGA approval included a rezone of the property to Planned Mixed Use (PMU) classification, amendment of the Comprehensive Plan, and annexation of the property to the City. The Master Site Plan anticipated development of 1,334 single family and multifamily housing units; 950,000 gross square feet (gsf) of business park uses; some limited retail development; 524 acres of open space (including undeveloped/protected and other open space, critical areas and buffers, and powerline right-of-way); trails and recreational facilities; and dedications, set asides or conservation of lands for public purposes and environmental protection, as described further below (see **Figure 2-1** for an existing aerial of the site and **Figure 2-2** for 2002 Master Site Plat). The UGA was planned to be developed in phases over an approximate 30-year period (by 2032).

2024 Bullfrog Flats Proposal EIS Addendum



Source: CORE Design, 2024.

Figure 2-1
Existing Aerial Site Map

2024 Bullfrog Flats Proposal
EIS Addendum

LAND USE SUMMARY

RESIDENTIAL USES	AREA (Acres)	Quantity Proposed
Single Family Residential	165	810 Units
Multi-Family Residential	56	524 Units
Affordable Residential	7.5	*
Subtotal	228.5 (20.8%)	1334 Units
NON-RESIDENTIAL USES: Trendwest Facilities		
Neighborhood Clubhouse & Lake	18	
Recreation Expansion	10.5	
Subtotal	28.5 (2.6%)	
OTHER USES		
Community Recreation Center	12	
School Expansion	35	
Cemetery Expansion	10	
Business Park	75	950,000 SF
Water Treatment Plant	12	
Reserve	175	
Subtotal	319 (29.0%)	
OPEN SPACE		
Undeveloped Open Space	246	
Buffers / Steep Slope Areas	172	
Powerline R.O.W.	37	
Residential Buffers	69	
Subtotal	524 (47.6%)	
Total	1100 (100%)	1334 Units

* 50 Units of Affordable Housing not included in total units

RESIDENTIAL USES

Housing Type	Gross Acreage (Acres)	Approximate Unit Yield	Density (Dwelling Units Per Acre)
Single Family			
Parcel P-1	30.1	120	2-5 DU/Acre
Parcel P-2	39.3	184	2-5 DU/Acre
Parcel P-3	19.4	118	3-7 DU/Acre
Parcel P-4	31.1	144	3-7 DU/Acre
Parcel S-1	17.7	96	3-7 DU/Acre
Parcel S-2	27.4	148	3-7 DU/Acre
Multi-Family			
Parcel B	17.3	150	8-15 DU/Acre
Parcel J	17.6	164	8-15 DU/Acre
Parcel M	21.1	210	8-15 DU/Acre
Affordable			
Parcel A	7.5	*	5-8 DU/Acre
Total	228.5	1334	2-15 DU/Acre

* 50 Units of Affordable Housing not included in total units



Source: City of Cle Elum, 2002.

Figure 2-2

An environmental impact statement (EIS) was prepared for the proposal to identify and to mitigate significant impacts to the environment. The Final EIS, published in 2002 (referred to hereafter as the 2002 UGA FEIS), considered 5 development alternatives; *FEIS Alternative 5* was ultimately approved by the City Council and embodied in the adopted master site plan, development agreement and conditions of approval.

The final approval and DA included 120 conditions, most of which incorporated mitigation measures identified in the EIS. The DA conditions required, among other things, dedications of land and/or funding for affordable housing, school expansion, a regional recreation center, water treatment plant, and reservation of a large site that could be used by the Washington State Horse Park. Trendwest also negotiated mitigation agreements with independent service providers (school district, Hospital District 2), city departments (police and fire), and Kittitas County solid waste. Trendwest also executed a Cooperative Agreement with the Yakama Indian Nation & Washington Department of Fish & Wildlife (WDFW), which would be implemented through a recorded conservation easement. The Cooperative Agreement addressed potential impacts to fish and wildlife habitat and cultural resources and limited land uses in a substantial area of protected open space (246 acres) that was established in the western portion of the site, adjacent to the Cle Elum River.

The Bullfrog Flats DA incorporated the adopted conditions of approval and established procedures and standards by which the UGA would be developed. Provisions include procedures for considering changes to the master plan, which were considered likely to occur over the development period. The DA also “vested” the approved project to city codes and regulations in effect at the time of approval, with some specified exceptions, during the term of the DA. The DA was amended in 2017 and extended the expiration date to 2027. The establishment of monitoring programs to track and reevaluate transportation impacts, to ensure that identified mitigation improvements were sufficient, and for fiscal conditions, to address any revenue shortfalls to the City budget, were provided for in the Conditions of Approval. However, only a Transportation Mitigation Agreement was entered into between Trendwest and that agreement has not been implemented to date because development of the UGA has not commenced. Aside from a short plat of the business park parcel approved in 2007, no other permitting or activity has occurred on the undeveloped site over the ensuing 20 years. Most required dedications of property have occurred; however, similarly, agreed upon mitigation dedications and/or payments to service providers (school district and hospital district) occurred pursuant to executed agreements.

In 2019, Sun Communities, a national real estate developer, purchased the property from New Suncadia (formerly Trendwest) and submitted a proposal to the City to develop 47^o North, a modified master plan project comprised of a housing component (SF and MF), a Recreational Vehicle (RV) resort, a commercial/retail center, and open space. To comply with SEPA, the City prepared a Supplemental EIS (SEIS) to the 2002 Bullfrog Flats UGA EIS for Sun Communities’ initial master plan because Sun Communities’ proposal differed substantially from the 2002 Bullfrog Flats UGA project. A Draft SEIS (DSEIS) was published in 2020 and a Final SEIS in 2021 (referred to hereafter as 2021 SEIS). The City followed required

procedures for publication, notice and commenting on the SEIS, including an optional public scoping process. An SEIS adds information and analysis about impacts to an existing EIS when the proposal has changed significantly and/or new significant impacts are likely (WAC 1971-1-600 (3)(b)). Both types of changes applied to the Sun Communities proposal. The 2021 SEIS for the Sun Communities project also updated environmental information from the 2002 UGA EIS concerning FEIS Alternative 5 (the approved master site plan using then-current conditions).

In 2023, Sun Communities modified its application and master site plan proposal. The City determined that the proposed changes were minor and did not significantly change the analysis of impacts in the SEIS. The City prepared an Addendum to the SEIS (2023 SEIS Addendum) to describe and evaluate these changes (WAC 197-11-600(4)(c), 197-11-706). The 2023 SEIS Addendum also included additional relevant information about SEIS Alternative 5 (the approved Bullfrog Flats UGA master site plan).

In May 2024, Sun Communities informed the City that it had received a proposal from Blue Fern (dba Bullfrog Flats LLC) (Bullfrog Flats), a Redmond-based development company, to acquire the property and to develop it consistent with the approved 2002 master plan. Sun Communities placed its application on hold to enable Blue Fern to complete its due diligence and to allow the City to process Bullfrog Flats' application. Following review and discussion of a pre-application package, Blue Fern submitted a complete application on September 19, 2024, along with a request to transfer the DA to Bullfrog Flats and to extend the DA's term for an additional ten years, such that the DA would expire on October 30, 2037. Several plan graphics were modified in response to City review comments and were resubmitted in November 2023. Review of the application follows procedures set forth in the Development Agreement and City Code.

Rationale for Bullfrog Flats SEPA Addendum

The impacts of the 2002 Bullfrog Flats UGA project are addressed comprehensively in the 2002 FEIS. As noted previously, the 2021 SEIS and 2023 SEIS Addendum each updated information about existing conditions at the UGA site and in the surrounding area. Each document also included updated information about Alternative 5 in the 2002 UGA FEIS, which was the alternative that was ultimately approved by the City Council in 2002 and reflected in the DA. For purposes of the SEPA analysis of the current Bullfrog Flats Project, this Addendum to the 2002 UGA FEIS adopts and references analyses from the 2021 SEIS and 2023 SEIS Addendum, both of which contain updated information and analysis of FEIS Alternative 5.

Based on review of the application, the City determined that the proposed master plat/master site plan is functionally equivalent to the Bullfrog Flats master site plan approved in 2002. For purposes of verifying SEPA compliance, the City reviewed the prior relevant SEPA documents and determined that changes to the 2002 proposal – which are

identified below – are minor in nature, and that no new or significantly different types or degree of environmental impacts are likely to occur from implementation of the Proposal. It is noted that some of the original conditions of approval and mitigation measures were satisfied previously. In addition, while updated analyses of transportation and fiscal conditions conducted for the current Bullfrog Flats Project have identified some revisions to the previously identified traffic improvements and fiscal mitigation, the City has determined these changes are appropriate to address current conditions and projected development. These and similar technical and functional changes or additions to proposed mitigation measures do not reflect new significant impacts. The City has elected to prepare an addendum to add additional information about the current proposal not contained in the 2002 FEIS and to document the basis of the City’s findings regarding the project’s compliance with SEPA (WAC 197-11-706).

This Addendum provides additional discussion of the Bullfrog Flats Project, impacts and mitigation measures. It summarizes existing environmental information, documents the minor changes to the Proposal, and highlights minor updates to previously identified impacts and mitigation measures. Updated analyses of Transportation and Fiscal Conditions included in Section 3.6 and Section 3.9, respectively.

Note that the analysis and conclusions of this Addendum are based on an analysis of conditions and impacts through buildout in 2037; this date is consistent with the applicant’s request to extend the DA’s term to 2037, and with the current planning horizon of the City of Cle Elum and Kittitas County Comprehensive Plans. The Addendum is focused on the rendered site plan and master plat included in the 2024 application at buildout. Impacts associated with the individual preliminary plats/phases would be incremental and are included within the impacts identified at buildout; the preliminary plats are not discussed separately. The staff report will evaluate the consistency of all project components – site plan, master plat and preliminary plats – with applicable regulations and the DA and conditions of approval in greater detail.

EIS Addendum - 2024 Bullfrog Flats Proposal

The 2024 Bullfrog Flats project application consists of the following components:

- Master Plat application;
- Rendered site plan;
- 3 preliminary plats, for the first 3 phases of residential development, referred to as Phases S-1, S-2, and J;
- A project narrative, which includes a description of the proposal, a projected phasing plan, and several appendices with environmental reports for soils/geology/groundwater and plants & animals and fisheries, wetland buffers, and a preliminary master drainage plan;

- A proposed Boundary Line Adjustment (BLA) to reconfigure the boundaries, but not the number, of existing parcels. The BLA is an administrative procedure that would have no substantive effect on the environment and is not discussed further;
- A request to transfer the DA to Bullfrog Flats;
- A request to extend the adopted DA for an additional 10 years; and,
- A request to approve 5 “minor modifications”, described further below.

Minor Modifications. The Bullfrog Flats application requests approval of 5 “minor modifications” to the DA. Minor modifications are defined in the DA (Section 6.4.1) as minor changes to the site plan that are consistent with the overall scope and intent of the conditions of approval. The DA also includes “flexibility objectives” (Section 6.3), which permits consideration of minor changes that yield a comparable or better result. Requested minor modifications include the following:

- (1) an increase in lot coverage for single family detached and multifamily lots (to 60% and 75% respectively);
- (2) a corresponding increase in impervious surface coverage for single family lots (to 70%);
- (3) removal of the limitation on garage door width relative to front façade for single family detached units (to allow 2-car garages);
- (4) substitution of a large public park and recreational amenities (specific amenities to be determined in the future) for the private man-made lake amenity and clubhouse in the original approval; and
- (5) private ownership and management of small pocket parks in residential neighborhoods by the project’s Homeowner’s Association. Other on-site parks would remain public.

The changes to lot coverage and impervious surface would not result in new significant impacts and will be addressed in stormwater management plans for individual phases of development (see the Section 3.8, Utilities, for details). The other requested modifications would not result in new or different environmental impacts.

The staff report would include recommendations to the Hearing Examiner on the requested minor modifications. The City Council will make the final decision on all of the project applications.

Applicant’s Objectives

The applicant has identified the following objectives for the proposal:

1. Develop the Bullfrog UGA consistent with the 2002 Development Agreement and Conditions of Approval into a master planned community that will provide for a range of residential housing, pocket parks, open space, and a business park.

2. Build, or dedicate a site for construction of 50 affordable housing units within the Bullfrog UGA for households earning less than 60% of the median income for Kittitas County, consistent with the 2002 Development Agreement.
3. Protect environmentally sensitive areas in and around the Bullfrog UGA, including the Cle Elum River, wetlands and steep slopes.
4. Ensure that the development is compatible with the surrounding community and land uses, and transportation.

Phasing Plan

The Bullfrog Flats Project's residential units will be developed in 9 phases, including 6 single family phases (P-1, P-2, P-3, P-4, S-1 and S-2); 2 townhouse (multifamily) phases (J and M), and 1 multifamily/apartment phase of development (B). Proposed phases are shown on **Figure 2-3**. The phasing plan for the business park will be determined in the future.

Timing of development is approximate and would vary with the time required for review and approval of development applications and in response to future changes in market or economic conditions. The current development schedule assumes completion of initial permitting, plat approval of the first 3 residential phases (S1, J and S2) and clearing/grading in Spring 2025. Construction of the units would start in Spring 2025. Permitting and construction of the remaining residential development phases are expected to be complete by 2037.

Preliminary Plat Applications

The application includes 3 preliminary plats for the first 3 residential phases of the project (S1, J and S2). As shown on the rendered site plan (**Figure 2-4**), these phases are located in the central portion of the site, east of primary project access from Bullfrog Road and proposed park and recreational amenities. The preliminary plats contain a total of 397 single family and townhome lots/units on 67 acres; average density would be approximately 6 dwelling units per acre. These phases would contain approximately 30% of total proposed units. Portions of the project's infrastructure -- including roads, stormwater facilities, water and sewer facilities and other utilities -- would be constructed in coordination with phased development. The proposed park and recreational amenities may be constructed during subsequent development phases or independent of a phase application.

2024 Bullfrog Flats Proposal EIS Addendum

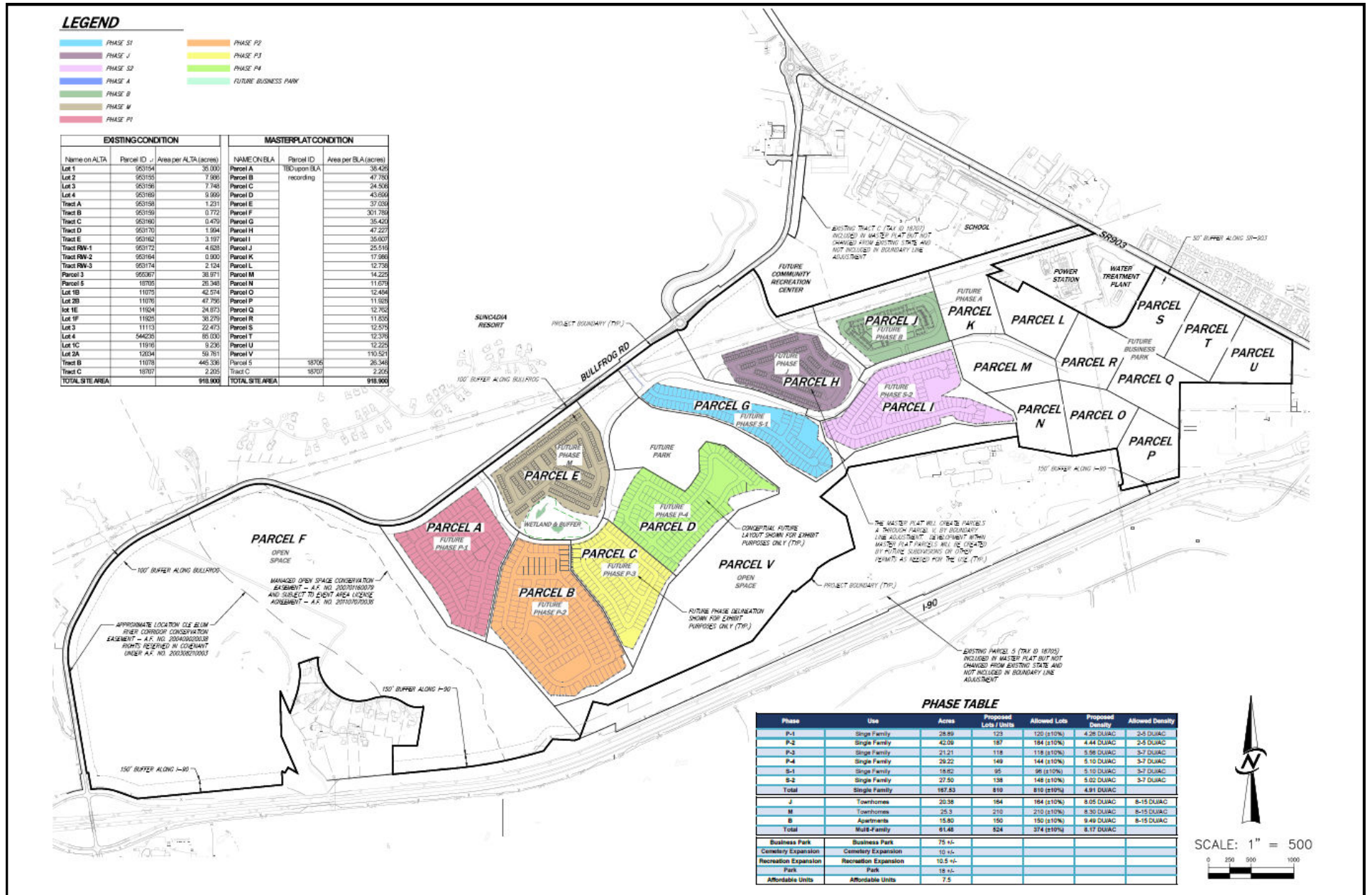


Source: CORE Design, 2024

Figure 2-3

2024 Bullfrog Flats Master Plat Phasing Plan

2024 Bullfrog Flats Proposal EIS Addendum



Source: CORE Design, 2024

Figure 2-4

2024 Bullfrog Flats Master Site Plan

As noted previously, this Addendum evaluates impacts associated with development of the overall 2024 Bullfrog Flats Project at buildout in 2037, based on review of the rendered site plan and proposed master plat. The impacts associated with the preliminary plats that comprise the first phase of development, incrementally and cumulatively, would fall within and are addressed in the Addendum analysis of the project at buildout. Details of development for each plat – such as lot coverage, landscaping, tree retention, lighting and signage, and engineering components – will be addressed through City staff review and evaluation of the individual plats and addressed in the staff report and recommendation to the Hearing Examiner.

Proposed Land Uses

The major land use and development aspects of the application are described below. **Table 2-1** below compares the categories and amounts of various land uses approved for the Bullfrog Flats UGA in 2002 and the land uses proposed for the current 2024 Bullfrog Flats Project. **Figures 2-2, 2-3, and 2-4** show the general arrangement of land uses for the 2002 approved Bullfrog Flats UGA master site plan and the proposed Bullfrog Flats Project rendered site plan, respectively. Major land use categories are described briefly below.

Note that **Table 2-1** is organized to correspond to the categories used in the land use table included in the 2002 Development Agreement and to identify the conformance of the Bullfrog Flats proposal with the 2002 UGA project. The total of 1,074 acres shown in the table includes the dedications of land to public agencies that have previously been transferred to various agencies. (The cemetery expansion site will be acquired by the City in the future.) If those lands are deducted, the total site area equals 918 acres.

Open space is the most substantial land use in terms of area, comprising almost 60% of the total site area. A large area of undeveloped open space – encompassing the Cle Elum River Corridor Open Space and Managed Open Space -- is located in the western portion of the site. This area is subject to the provisions of a Cooperative Agreement and conservation easements that limit permitted activities within these open spaces to protect wildlife, habitat, cultural and recreational values. Another large open space area (a portion of the original “Reserve” area) is located in the south-central portion of the site, contiguous to the Horse Park. Other open spaces include buffers located between residential areas, to protect critical areas (steep slopes, wetlands), and the powerline right-of-way.

Residential uses are concentrated in the central portion of the site and would occupy approximately 25% of the total site area. Housing types include single family (810 units), townhomes (374 units) and apartments (150 units). Average residential density would be 5.8 dwelling units (du) per acre, ranging from 4.9 du/acre for single family housing and 8.7 du/acre for multifamily housing. These densities are consistent with the densities identified in the DA.

Table 2-1
LAND USE SUMMARY (BUILDOUT)

Project Element	2002 UGA & DA		2024 Bullfrog Flats (Blue Fern Proposal)	
Residential	Acres	Units	Acres	Units
Single Family	165 ac.	810	167.5	810
Multifamily	56 ac.	524	61 ac.	524
Subtotal	221 ac.	1,334	229 ac.	1,334
Affordable Units	7.5 ac. site	50	7.5 ac. site	50
Business Park	75 ac.	950,000 gsf	75 ac.	950,000 gsf
Open Space¹				
Undeveloped open space	246 ac.		242 ac.	
Steep slopes/buffers and open spaces	172 ac.		197.4 ac.	
Wetland buffers			5.5 ac.	
Powerline ROW	37 ac.		29 ac.	
Residential buffers	69 ac.		76 ac.	
Subtotal	524 ac.		549.9 ac.	
Parks/Recreation				
Lake & clubhouse	18 ac.		16 ac.	
Recreation expansion	11 ac.		8 ac.	
Neighborhood pocket parks ²			--	
Other Uses/Dedications³				
Community rec center	12 ac.		12 ac.	
School expansion site	35 ac.		38 ac.	
Cemetery expansion site	10 ac.		10 ac.	
Water treatment plant site	12 ac.		12 ac.	
Reserve (Horse Park, I-90 buffer, open space)	175 ac.		112 ac.	
Total	1,100 ac.	1,334 units	1,074ac.^{3,4}	1,334 units

Notes:

1. Fractional numbers have been rounded. Undeveloped Open Space encompasses a River Corridor Open Space area, protected by a 3-party Cooperative Agreement and Conservation Easement, a Managed Open Space area, subject to a conservation easement. Additional open space and buffer areas included on the site plan but not reflected in the Open Space category of the table, include 112 acres of the Reserve site (Other Uses/Dedications), an approximate 36-acre portion of Parcel F contiguous to the Managed Open Space (white area on master plat); and an unspecified portion of the "Future Business Park" area shown on the site plan.
2. The DA requires 1.56 ac of pocket parks. According to the master plat application, the Proposal includes a minimum of 3 pocket parks each at least .25 ac and would meet or exceed the DA requirement. Pocket park acreage is included in the residential development parcels.
3. All required dedications of land listed as "other uses", except for the cemetery expansion site, have been transferred to the appropriate agency/service provider. The total site area that would be developed pursuant to the master plat equals 918 acres if the acreage of the completed dedications is deducted.
4. Note that total property size shown for the Bullfrog Flats Project reflects the entire property that Sun Communities purchased from New Suncadia and that the applicant would purchase from Sun Communities. The difference in acreage reflects rounding, survey decisions and overlap of some categories.

A 7.5-acre site for 50 units of affordable housing is also identified (Phase A). As set forth in the DA, the 50 affordable units are not counted towards the maximum of 1,334 units. As an option to donating a 7.5 acre site for future development by a non-profit, the applicant may propose to develop the site and construct the units itself. In addition, consistent with DA condition of approval No. 20, 150 housing units would remain rental units for a period of 20 years.

Business Park uses are included on a 75-acre site in the eastern portion of the property, adjacent to SR 903 and the city's water treatment facility. A wide range of light industrial and office uses are permitted in the applicable zone; heavy industrial uses (i.e., those generally associated with noise, smoke and other polluting emissions) are prohibited. In addition, the Cle Elum's updated Critical Area Regulations (CEMC 18.01) designates the entire City as a critical aquifer recharge area, which may further limit the range of permitted land uses to protect groundwater. The 2002 conditions of approval also permit limited service/retail uses, only to serve the business park, and not overall population of the project of the City.

The current application is focused on residential development and does not include business park development. The applicant is prioritizing meeting local housing needs and intends to conduct more detailed planning for the commercial parcel in the near future. DA condition of approval No. 12e allows the business park to be developed in phases, provided that 37.5 acres are included in the first phase of business park development. Subsequently, the developer may propose a modification to the conditions of approval and approved land use if insufficient market demand for business park uses is demonstrated. Any proposed modification would follow procedures and requirements set forth in the Development Agreement, including additional SEPA review.

The addendum analyses of transportation impacts and fiscal conditions examine 2 different scenarios for business park development. The approved UGA project and the 2002 FEIS assumed a 30-year development period for the business park, but the current Bullfrog Flats Project has an estimated 15-year buildout period for the residential uses. To reflect the difference in buildout schedules, and to provide a reasonable estimate of likely impacts, the Addendum's traffic and fiscal analyses examine varying amounts of business park development within the 15 year buildout period: 475,000 gsf (one half the total amount approved in 2002) is evaluated to adjust for the proposed 15-year residential buildout period; and a second scenario that assumes no business park development. This is intended to provide a sensitivity analysis that highlights the impacts of the business park. Refer to Section 3.6 and Section 3.9 and Appendices D and F for the detailed analyses.

Other Uses include 244 acres that were required to be dedicated to the City or to other entities for public uses, including sites for a school, for the community recreation center, for a water treatment facility, for expansion of the cemetery, and a "reserve" site for the Washington State Horse Park, open space and buffers required under DA conditions of

approval Nos. 27-29. All required dedications have been completed, and separate tracts and conservation easements for the buffers have been established.

Parks and recreation facilities would be dispersed throughout the site. The proposal includes an 18-acre public park complex containing recreational amenities near the center of the site; specific features and amenities are still in the planning stage. Planned trails along site roadways would provide pedestrian/bike access from surrounding neighborhoods. Specific plans and designs for the fields are being developed in coordination with the City. The park would likely be developed in the initial phases of development. Multiple small neighborhood pocket parks (minimum .25 acres each) would also be developed in phase with residential neighborhoods. The DA requires a total of 1.56 acres of pocket parks. As noted previously, proposed minor modifications to the conditions of approval include substitution of the public park for a private man-made lake amenity, and private ownership and management of the pocket parks.

Overall, the proposed Bullfrog Flats Project reflects the types, quantities and arrangement of land use approved in the 2002 master site plan and DA. As documented in the Addendum, proposed changes are individually and collectively considered minor and do not substantially change the conclusions of the prior environmental analysis or result in significant new or different impacts.

Infrastructure

All roads and other infrastructure would be public and designed to City standards. Details of proposed infrastructure are included in the application package, which may be reviewed on the City's website.

Roads/Access. Access to the site ultimately would be provided from 2 locations on Bullfrog Road and 1 on SR-903. A collector arterial would transect the entire site, providing a connection between Bullfrog Road and SR-903, and connections to planned residential neighborhoods. The road would consist of 2 travel lanes with a landscaped median, 8-foot planter strips on both sides, and a 10-foot paved pedestrian/bike path. (Note that road design is still being discussed.) A new road connecting this arterial south to Douglas -Munro Blvd is also proposed. Residential streets throughout the project would consist of 2 travel lanes with 6-foot planter strips and a 5-foot sidewalk on both sides.

Minor adjustments to the specific locations for planned access to the site on Bullfrog Road and SR 903 are proposed. These adjustments are in response to development that has occurred along SR-903 since adoption of the UGA plan (i.e. to line up driveway) and to facilitate turning movements and traffic flow.

Trails. Approximately six miles of multi-use trails would extend throughout the site, and would connect residential neighborhoods with one another, with on-site recreational facilities and with the regional trail system. Hard-surfaced pedestrian/bike paths would be

provided along the site's roads, and gravel-surfaced pedestrian trails would thread through the residential area. An equestrian trail would provide a connection from the Horse Park to the off-site regional trail system. The trail system would be developed in phases in conjunction with phased development of the project.

Utilities

Stormwater. Stormwater from impervious surfaces, including roadways and sidewalks, will be routed to catch basins and through piped conveyance systems to runoff treatment and flow control facilities. Most stormwater will be infiltrated but detention will be required in a few areas to reflect soil limitations. The stormwater system would be constructed in phases, in sync with phased development of the project. A detailed stormwater plan would be submitted with applications for each phase of development.

The Bullfrog Flats Project application includes a Preliminary Master Drainage Plan (MDP) was submitted with the application. Approaches to water quality treatment are based on Ecology's 2024 Surface Water Management Manual for Eastern Washington. Current planning-level estimates are that approximately 143 acres of the site (15.6%) will be developed with impervious surface and will require "basic treatment." Bioretention and dispersion are expected to provide the majority of runoff treatment for all project phases. The first three phases of development all propose the use of bioretention areas (BMP F6.23) which provide both basic and "enhanced" (called "metals" in the 2024 manual) treatment by infiltrating stormwater through bioretention soil mix.

The 2002 MDP proposed Infiltration of all site stormwater, but more recent analysis of site soils has determined that infiltration is not feasible for some phases of the Bullfrog Flats Project. Based on preliminary design, phases S-1, J and S-2 propose infiltration ponds that will infiltrate 100% of the design storm. Phases P-1 and P-2 are located within low infiltration potential soils, and detention ponds or vaults may be appropriate for providing flow control. The specific BMPs proposed will be determined during the preliminary design of each phase.

During construction, temporary stormwater management measures would be implemented to prevent erosion and sedimentation and the transport of pollutants to downstream water resources. A Temporary Erosion & Sedimentation Control Plan (TESCP) would be required for each phase of development and would implement Best Management Practices (BMPs) of the Construction Stormwater Pollution Prevention Plan (SWPPP) and the applicable NPDES Permit.

Water and Sewer. Water and sewer service would be provided by the City of Cle Elum. Potable water would be supplied to the site from the City's Water Treatment Plant, located adjacent to the business park area. The site of the treatment plant was dedicated to the City in conjunction with the 2002 UGA approval. The applicant has acquired water rights that are sufficient to serve the Bullfrog Flats Project, and the applicant will transfer rights to the

City of Cle Elum in conjunction with plat applications. The on-site water system is shown in the application. Storage and pumping improvements to Pressure Zone 3 may be required prior to full buildout of the 2024 Proposal; refer to the Utilities section of this Addendum for detailed information.

Wastewater collection and treatment would be provided by the Upper Kittitas County Regional Wastewater Treatment Plant, which is operated by the City of Cle Elum. This regional facility was constructed to provide service to Cle Elum, Suncadia, the Bullfrog Flats site and City of Roslyn; capacity to serve the Bullfrog Flats site was specifically reserved. Demand is estimated to be less than originally identified for the UGA; no off-site wastewater improvements will be necessary. Refer to the Bullfrog Flats Project application for a description of the on-site system.

Mitigation Measures and Proposed Changes to the 2002 DA Conditions of Approval

The 2002 DA included certain conditions of approval, which were developed to mitigate the environmental impacts of the 2002 approved Master Site Plan and identified in the 2002 UGA FEIS and derived from various other approval processes for the project. The 2024 Proposal does not result in any new significant adverse impacts as compared to the 2002 approved Master Site Plan/FEIS Alternative 5. However, the City staff's proposed mitigation measures for this Proposal include minor changes to the wording of some DA conditions of approval; modification of some mitigation measures to reflect updated analyses or voluntary agreements; and/or changes to required monitoring programs to reflect updated analyses.

UPDATED INFORMATION AND ANALYSIS

Chapter 3

UPDATED INFORMATION AND ANALYSIS

Introduction

The following provides an overview of the general content and organization of each section within **Chapter 3** of this Addendum to the 2002 UGA FEIS for the Cle Elum UGA master site plan. **Chapter 3** updates and adds information about impacts and mitigation measures for the currently proposed 2024 Bullfrog Flats Proposal, including changes in background conditions. The focus of this chapter of the Addendum is to assess the current Proposal and its associated impacts. The discussion also incorporates the environmental analysis contained in prior related environmental documents prepared for 2 recent proposals on the Bullfrog Flats site: a 2021 SEIS and a 2023 SEIS Addendum. Both documents contain updated analysis of the 2002 Bullfrog Flats UGA project as it was approved by the City Council. In general, the Addendum identifies that the changes in the 2024 Proposal and differences in impacts identified in the 2002 FEIS or related environmental documents are incremental in nature, do not change the substance of the prior analyses, and are not anticipated to result in impacts that are new or significantly different in type or degree.

Since the original publication of the 2002 UGA FEIS, conditions on the proposed Bullfrog Flats site have remained primarily unchanged. The site is still undeveloped and mostly covered with forest and other vegetation. Approximately 174 acres of the original UGA site area have been previously dedicated to various agencies – school district, Washington State Horse Park, and the City of Cle Elum – for public uses (school, water treatment facility, Washington State Horse Park), pursuant to SEPA mitigation measures/agreements, conditions of approval, and the Development Agreement.

The proposed 2024 Bullfrog Flats Project follows the decisions outlined in the approved 2002 Master Site Plan. For example, it includes the same amount of total housing units (1,334) and the same split of single family and multi-family residences that was analyzed for Alternative 5 in the 2002 UGA EIS and other SEPA documents. The locations of various land uses on the site are substantially the same. The Addendum evaluates whether the minor changes to the proposal and changes on or near the site or in the City as a whole, would result in new or significantly different impacts and requirements for mitigation.

Section 3.0

NATURAL ENVIRONMENT

Prior Environmental Analysis

Earth

The 2002 Master Site Plan and 2002 UGA FEIS addressed an 1,100-acre site of which 403 acres would be cleared area and developed with 247 acres of impervious surfaces. The 2002 UGA EIS estimated that development would require approximately 584,000 CY of cut and 420,000 CY of fill. The updated soils and geology analysis in the 2021 SEIS and 2023 Addendum identified some areas of the site that present risks for erosion and landslides: specifically, the steep slopes (15% to 40% and greater) along the Cle Elum River, the West Ridge, the Central Ridge and the East Ravine. The site is also located in an area of low historical seismicity. With the implementation of mitigation measures identified in the 2002 FEIS, it was anticipated that development would not increase geologic hazard risks and that there would be no significant unavoidable adverse earth-related impacts.

The City updated its critical area regulations in 2023. Among other changes, the regulations designated the entire city as a critical aquifer recharge area (CARA); regulations now require a groundwater analysis and application of best management practices for types of land uses that involve a potential to pollute groundwater (CEMC 18.01). Wetland buffer requirements were also modified.

Air Quality and Greenhouse Gas (GHG) Emissions

The 2002 UGA FEIS (Section 3.2) evaluated the air quality impacts of full buildout of the master site plan (30-year buildout assumed complete 2032) from construction and operation of residential and commercial land uses. Vehicle emissions would be the primary source of air emissions during operations. Modeling of emissions at congested intersections, including carbon monoxide (CO) and carbon dioxide (CO₂), a greenhouse gas (GHG), concluded that emissions from the master plan would be within the applicable National Ambient Air Quality Standards (NAAQS). Cumulative impacts would similarly be within the standard. Impacts from construction would include dust, fine particulates (PM₁₀) and CO from construction equipment. Mitigation identified for these impacts included dust controls and emission controls, which would be required by an Ecology air quality permit.

The updated analysis of the Bullfrog Flats UGA alternative (Alternative 5) in the 2021 SEIS (Section 3.4 and Appendix F) concluded that emissions would be within applicable regulatory limits. The analysis noted that the Bullfrog Flats site is located in an attainment area for all criteria pollutants and increased traffic from the project is unlikely to cause localized air pollutant concentrations that could form a “hot spot.” Annual GHG emissions were calculated using Ecology’s SEPA GHG Calculation Tool (2021 SEIS Table 3.4-2). However,

no guidance or standard currently exists to determine whether any particular level of GHG emissions constitutes a significant impact or when mitigation should be considered.

Water Quality

The Cle Elum UGA lies within the Upper Yakima River drainage basin, and the proposed site is adjacent to the Cle Elum River between Bullfrog Road and I-90. In 2002, the Cle Elum River from the mouth to Cle Elum Dam was designated as Class AA (extraordinary) for water quality (per Chapter 173-201A WAC). The Yakima River was designated as Class A (excellent) water quality for the reach from its mouth to the confluence with the Cle Elum River, and Class AA (extraordinary) for the reach from the Cle Elum River confluence to its headwaters. A special condition was applied to the reach from the Cle Elum River to its headwaters indicating that temperature shall not exceed 21° C due to human activities. The 2002 FEIS Alternative 5 avoided development near the Cle Elum River, which is the highest risk portion of the UGA, to prevent sediment introduction into the river from clearing and grading. A stormwater management system for the site would be implemented.

Alternative 5 also included several artificial water bodies, including a large, artificial lake which would require specific design features to ensure stormwater would not discharge to the lake and grading to direct shoreline runoff away from the lake; a lake management and monitoring program would also be required to ensure safe water quality conditions. The 2002 FEIS concluded that no significant impacts to surface water resources would occur if recommended mitigation measures were implemented. Potential impacts to groundwater would be mitigated through the water quality treatment component of the stormwater management system.

Wetlands

The 2002 UGA EIS identified five wetlands (3.9 acres total) within the Cle Elum UGA, located in the River Corridor and Managed Open Space areas. These wetlands were reviewed and, in some cases, re-delineated as part of the 2021 SEIS. One additional wetland was also identified in the 2021 SEIS analysis. The boundaries of Wetlands 1, 2 and 3 were verified but not re-delineated as part of the 2021 SEIS since they are located in the Cle Elum River corridor, which limits disturbance, and within proposed natural open space areas. Wetlands 4 and 5 were re-delineated and surveyed as part of the 2021 SEIS and rated as Category I and II wetlands, respectively; each would require a 75-foot buffer.

In addition, the 2021 SEIS identified and delineated a new small, isolated wetland (Wetland 6) located to the east of Wetland 5. Wetland 6 is rated as a Category III wetland which requires a 60-foot buffer. Of those originally identified wetlands, there are three wetlands (Wetlands 4, 5, and 6) and, with the exception of the Cle Elum River, no streams or other surface water bodies are located on or within 300 feet of the site area (see 2021 SEIS Section 3.3 for further details on each of the wetlands).

Plants & Animals

The 2002 UGA FEIS observed or documented signs of 12 mammal species, 90 bird species, and 7 species of reptiles and amphibians on the Suncadia and Bullfrog Flats sites and vicinity. The 2019 field investigation for the 2021 SEIS confirmed prior findings with respect to those species likely to be present during the fall.

The 2002 UGA FEIS concluded that Bullfrog Flats development would result in a reduction in vegetation on the site, which would cause the fragmentation, alteration, and removal of wildlife habitat onsite, which would cause a decrease in wildlife diversity and abundance. Clearing and grading activities could also promote the establishment of invasive and exotic species.

The 2002 UGA FEIS noted that development of the site would not result in probable significant adverse impacts to federally-listed (i.e., threatened or endangered) plant or animal species, but would reduce the capacity of the site to support elk. Operational impacts would be minor and principally related to increased disturbance from human activity, including vehicle traffic. Wildlife mortality could increase with higher traffic levels, and new road segments would create new barriers to wildlife movements. The 2002 FEIS identified potential construction impacts to wetlands, wetland buffers, and associated functions and values from clearing, filling, and grading activities. Measures to mitigate potential construction impacts (e.g., clearing marking buffer boundaries) were identified. No direct impacts to wetlands or buffers were identified.

The 2002 master site plan and conditions of approval included two large contiguous areas of undeveloped open space – the Cle Elum River Corridor Open Space and Managed Open Space – which contained valuable wildlife habitat. These areas were subject to a Cooperative Agreement and recorded conservation easements intended to protect and preserve these open spaces and their habitat values from alteration.

Noise

The 2002 UGA FEIS (Section 3.8) documented existing noise levels on and around the site. The EIS analysis used an FHWA-approved computer model to predict future noise levels along adjacent roadways and concluded that traffic noise would be the primary noise source associated with the UGA master site plan. Based on projected increases in traffic growth on Bullfrog Road and SR-903, however, noise levels were projected to increase by less than one dBA on weekdays at receptors along the roadways, including the School District campus, and would be well within applicable noise limits.

The 2021 SEIS updated existing conditions, measured noise levels at selected locations and modeled noise levels on and surrounding the site (Section 3.5 and Appendix G). Using WSDOT procedures and FHWA criteria, existing and future noise levels were documented during peak traffic hours. City of Cle Elum and Washington State noise regulations were used to determine compliance with standards.

Noise levels were modeled to be well within applicable standards. Increases in traffic noise were modeled to be less than one dBA at receptors along affected roadways and would not be perceptible to the human ear. Mitigation measures were recommended to address short-term construction noise.

EIS Addendum - 2024 Bullfrog Flats Proposal

Earth

The 2024 Bullfrog Flats Proposal would develop the 1,074-acre site with a similar layout and mix of uses as the adopted UGA master plan (2002 FEIS Alternative 5). Approximately 403 acres of clearing would occur, and development would require approximately 644,000 CY of cut and 420,000 CY of fill, avoiding steep slopes. Estimates are almost the same as those for the 2002 UGA project; however, that land disturbance estimates may change as detailed plans and clearing and grading permit applications are prepared. Erosion and sedimentation could occur onsite, but overall risk is considered low. A Temporary Erosion and Sediment Control Plan (TESCP) and a Stormwater Pollution Prevention Plan (SWPPP) would be developed for the project. No indications of historical landslide activity or springs were observed on the project site.

Air Quality and Greenhouse Gas (GHG) Emissions

Landau Associates, the City's air quality consultant, reevaluated the existing air quality analyses to reflect the currently proposed construction schedule for the 2024 Bullfrog Flats Project: 1,334 residential units and 475,000 sf of business park by 2037 (see **Appendix A** for further details) The updated transportation analysis prepared for the Bullfrog Flats Project was also reviewed. (see **Appendix A**). No changes to the FEIS or subsequent air quality analysis are required based on this reevaluation. No new or different significant impacts were identified, and no additional mitigation measures are required.

Water Quality

The prior environmental analysis indicates that surface water and groundwater resources are much the same as they were in 2002. For both the Yakima and Cle Elum Rivers, the water quality standards have generally remained the same as in the original 2002 UGA EIS. The only notable update is that the Yakima River (from its mouth to the confluence with the Cle Elum River) has a reduced temperature requirement from 18°C (64.4°F) to 17.5°C (63.5°F). There are currently no impervious surfaces on the Bullfrog Flats site. As noted previously, the current critical areas ordinance (CEMC 18.01) designates the entire City as a critical aquifer recharge area, subject to project-specific groundwater analysis. Prior studies indicate that the glacial outwash beneath the site is partially recharged by direct precipitation.

Adopted conditions of approval require that temporary erosion/sedimentation measures would be implemented to control construction impacts, consistent with current stormwater regulations. In addition, a permanent stormwater management system would be installed onsite, in accordance with the 2024 *Washington State Department of Ecology Stormwater Management Manual for Eastern Washington* (to control potential operational impacts on water resources. As with the 2002 UGA EIS Alternative 5, the proposed primary stormwater management technique for the 2024 Bullfrog Flats Project is infiltration, except where soils limit this technique. Impacts on water quality or wetlands, if any, would be short term, with no broad or cumulative effects; the 2002 EIS reached the same conclusion. Implementation of the proposed TESC plan and SWPPP would avoid significant water quality impacts from isolated and localized releases of turbid water or petroleum products.

In addition, the 2024 Proposal does not include the man-made lake amenity, which would eliminate the need for specific stormwater and grading features that were identified in the 2002 UGA EIS, as well as the need for a lake management and monitoring program for a large, artificial water body.

Wetlands

The proposed 2024 Bullfrog Flats Project site plan is designed to meet all applicable critical area requirements in the Cle Elum code (CEMC 18.01) and would not result in direct impacts to wetlands or buffers. The City's current regulations require that wetland buffers also need to consider habitat score as part of their evaluation. Wetlands 4, 5 and 6 each have a habitat score of 6 and per Cle Elum Municipal Code Table 18.01-1, wetlands with a rating of I, II or III and a habitat score of 6 would require a 110-foot buffer. The rendered site plan and master plat for the 2024 Bullfrog Flats Proposal identifies a 110-foot buffer for each of the three wetlands. As more detailed development design occurs, buffer averaging could be necessary to accommodate the proposed main spine roadway through the site and to avoid impacting wetland buffers. If necessary, buffer averaging would be utilized in accordance with applicable City of Cle Elum requirements and would provide equivalent or increased overall buffer area to protect the wetlands. With adherence to applicable critical areas requirements from the Development Agreement and City of Cle Elum code, it is anticipated that no new or different significant adverse impacts to wetlands would occur.

Plants & Animals

The 2024 Bullfrog Flats Proposal would have no direct impacts to fish or fish habitats of the Cle Elum or Yakima Rivers. Stormwater runoff would be collected, undergo water quality treatment in accordance with current Ecology stormwater management regulations, and infiltrated and dispersed such that no direct discharges would be routed to waters of the Yakima River, which are located approximately 3,000 ft. away. Consequently, no significant impacts to the water quality of receiving waters and associated aquatic and fish habitat are expected under this alternative.

The 2024 Bullfrog Flats Proposal would eliminate most of the existing wildlife habitat on the developed portions of the site, and would replace habitat with buildings, paved roads, and graded and landscaped areas. This would result in displacement of wildlife occupying those areas and would reduce local populations of most wildlife species currently on the site. These impacts, which are unavoidably associated with urban-scale development, are the same as those identified in the prior analysis for the 2002 UGA master plan. Additionally, the Proposal incorporates the Cooperative Agreement and conservation easements that preserve and limit land uses in a substantial area of protected open space, and that the DA conditions of approval required as mitigation for potential impacts to wildlife and habitat. Neither the prior nor present proposals would substantially affect endangered, threatened, or sensitive wildlife species.

With respect to other priority species, impacts of the 2024 Bullfrog Flats Proposal would be generally comparable to habitat as identified in the 2002 UGA EIS and subsequent SEPA documents. Current forest habitat conditions are similar to those documented from past investigations. Forest regeneration continues in the early successional mixed conifer forest in the west-central portion of the site, with young trees growing taller and filling in more of the area. Some additional forest thinning has occurred in the forest areas along either side of Wood Duck Road in the western part of the site near the river. Approximately 546 acres or 59% of the site will be retained as some form of open space under the 2024 Bullfrog Flats Proposal, which is greater than the approved 2002 UGA master plan. The current proposal is not expected to impact any endangered, threatened, or sensitive plants, as none of these species are known or expected to occur on the site.

Noise

The existing noise environment has not changed significantly since existing conditions were updated in the 2021 SEIS. Noise from vehicles on local roadways would be the primary source of noise associated with the proposed 2024 Bullfrog Flats Project. Landau Associates, the City's noise consultant, estimated potential changes in traffic noise (see **Appendix A** for details). The analysis compared trip generation estimates for 2002 EIS Alternative 5 and the updated transportation analysis for the current proposal. Weekday peak hour trips for the 2024 Bullfrog Flats Proposal are projected to be lower than those from Alternative 5. No changes to short-term construction noise or long-term operational noise from the types or locations of land uses are anticipated. No new or significantly different impacts would occur from the 2024 Bullfrog Flats Project and no additional mitigation is warranted.

It is noted that these conclusions assume construction of one-half of the business park by 2037. Additional noise analysis may be necessary in the future, to address additional business park development, particularly if federal or state funds are used for roadway or intersection improvements.

Section 3.1

LAND USE

Prior Environmental Analysis

Land use of the Bullfrog Flats site has not changed since the 2002 UGA EIS. The site is still vacant, undeveloped, covered with trees and other vegetation, and contains informal trails used by the public for a variety of recreational activities. Approximately 174 acres of the original UGA site area have been previously dedicated to or for the use of various agencies – school district, Washington State Horse Park (leasing property dedicated to the City for that purpose), and the City of Cle Elum – for public uses (school, water treatment facility, Washington State Horse Park), pursuant to SEPA mitigation measures/agreements, conditions of approval, and the Development Agreement. A continuous vegetated buffer exists along the boundary of the site, adjacent to Bullfrog Road on the west, SR 903 on the north.

The land use pattern in the surrounding area includes Suncadia, an approximate 6,000-acre master planned resort, which is located north and west of the site in unincorporated Kittitas County. The resort currently contains approximately 1,530 residential and short-term accommodation units; it is approved for a total of 4,650 units. Numerous residential plats have also developed in unincorporated rural areas north and west of the site. Lands adjacent to the site have developed with public uses (school expansion, water treatment plant) and residential uses. City Heights, a planned 800-unit development north of the site, has recently begun to develop; buildout is expected to occur over a 10-15 year period.

The 2002 Bullfrog Flats UGA approval is for a planned mix of urban uses, including single family and multifamily residential units, business park development, and recreational and open space uses; refer to **Table 2-1** for additional information about planned uses. Limited/incidental retail uses are also allowed to serve on-site uses. The Bullfrog Flats Proposal contains the same types and mix of land uses and is consistent with uses permitted in the Planned Mixed Use (PMU) zoning classification.

The range of impacts associated with planned development, identified in prior SEPA documents include: conversion of a vacant/forested site to a mix of land uses developed at urban intensities; potential conflicts between the site and adjacent uses that are different in type or intensity; and the potential to create development pressure on nearby undeveloped or underdeveloped lands in response to additional population and employment and the demand for goods and services created by Bullfrog Flats.

Mitigation measures identified in the 2002 FEIS and incorporated into the 2002 approval of the Bullfrog Flats UGA Master Site Plan and Development Agreement, address the range of impacts that were identified in the 2002 environmental analyses. These include retention of a vegetated buffer around the perimeter of the site to buffer adjacent land uses and to limit views; retention of a substantial portion of the site as open space (47%); limitation of retail

uses to encourage use of local businesses; provision of parks, trails and recreational amenities to serve the needs of residents; dedication of a site for construction of affordable housing by a non-profit entity; and dedication of land and/or fees or mitigation agreements to address impacts to public services and utilities.

At the time of the 2002 UGA FEIS, the Bullfrog Flats site was largely vacant and undeveloped, and comprised of three visually distinct zones: a riparian zone along the Cle Elum River in the western portion of the property, an adjacent broad flat river valley; and terraced uplands, bisected by two ravines, on the eastern portion. The site remains undeveloped and is characterized by vegetated and forested areas. The 2002 UGA FEIS, (Alternative 5, ultimately approved by the City Council) anticipated that the undeveloped site would be converted to residential uses, a business park, recreation and open space areas. Development would change the existing visual character of the site and potentially affect view opportunities to and from the site. While development under Alternative 5 would change the visual character of the site, it was not anticipated to block any important vistas from offsite locations.

EIS Addendum – 2024 Bullfrog Flats Proposal

The 2024 Bullfrog Flats Proposal is almost identical to the approved Master Site Plan in terms of the proposed types, amounts and intensities of various land uses, and is consistent with the existing and planned land use pattern in the surrounding area. The amount of retained open space in the Proposal would increase. A proposed change in the project's major recreational facility – from private amenity to public park and recreational amenities – would meet identified City-wide needs for recreational amenities and is considered positive. Minor adjustments to the exact locations of project access on Bullfrog Road and SR 903 are proposed to reflect adjacent land uses and existing traffic controls. These changes to the proposal are not considered significant and would not result in impacts that are significant or are different in type or degree compared to impacts identified in the 2002 FEIS or subsequent environmental documents. Similarly, the applicant's requested minor modifications to development standards (relating to lot coverage and garage door width) do not result in any significant changes to land use types, densities, or impacts. Although some applicable conditions of approval may be updated or fine-tuned to reflect current conditions, no additional mitigation measures for land use would be necessary.

The Staff Report for the project will review and determine the consistency of the proposal with applicable policies and zoning and other development regulations.

Section 3.2

AESTHETICS/LIGHT & GLARE

Prior Environmental Analysis

Aesthetics

At the time of the 2002 UGA FEIS, the Bullfrog Flats site was largely vacant and undeveloped, and comprised of three visually distinct zones: a riparian zone along the Cle Elum River in the western portion of the property, an adjacent broad flat river valley; and terraced uplands, bisected by two ravines, on the eastern portion. The site remains undeveloped and is characterized by vegetated and forested areas. The 2002 UGA FEIS, (Alternative 5, ultimately approved by the City Council) anticipated that the undeveloped site would be converted to residential uses, a business park, recreation and open space areas. Development would change the existing visual character of the site and potentially affect view opportunities to and from the site. While development under Alternative 5 would change the visual character of the site, it was not anticipated to block any important vistas from offsite locations.

The 2002 visual analysis was updated in the 2021 SEIS to reflect current conditions. It identifies numerous key view locations in the surrounding area from which the site is visible to passing vehicles and pedestrians from adjacent public roads – Bullfrog Road, SR 903 and I-90 – and to hikers and other recreators from more distant higher elevations, including Peoh Point. The analysis uses photographic simulations to evaluate the extent and character of visual change to the site from development (e.g. see 2020 Draft SEIS Section 3.8). In general, the analysis indicates that development of the undeveloped, forested site for urban mixed-use development would change its current visual character substantially and that the change would be experienced by the greatest number of people from the adjacent roadways. However, large portions of the site would be preserved in open space, and forested buffers would be retained along the perimeter of the site, which in combination with site topography, would obscure or screen views of development from immediate surrounding areas. To minimize and mitigate visual impacts, the DA's conditions of approval for the site require vegetated perimeter buffers for site areas that are adjacent to existing roadways, including a 150-foot buffer adjacent to I-90, a 100-foot buffer adjacent to Bullfrog Road, and a 50-foot buffer adjacent to SR 903. In addition, a significant portion of the site would be preserved as open space and subject to conservation easements that would limit physical alteration.

Light and Glare

The undeveloped Bullfrog Flats site does not contain any sources of lighting. Light and glare anticipated for 2002 UGA FEIS Alternative 5 included street lighting, residential lighting, and lights from increased vehicle traffic. This would all increase the amount of visible light during the evening. Proposed vegetated buffers would minimize the amount of additional visible light from beyond the project site at ground level. Development under Alternative 5 would

also create some level of skyglow, which is artificial light that reflects off the night sky and reduces the clarity of astronomical observations. Skyglow would be minimized through the implementation of lighting design standards identified in the Development Agreement. Impacts from additional lighting introduced to the project area are not anticipated to be significant and would be typical of a developed community. Implementation of mitigation measures would ensure minimization of impacts from additional lighting within the project site.

EIS Addendum – 2024 Bullfrog Flats Proposal

Aesthetics

Aesthetics and visual impacts with the 2024 Bullfrog Flats Proposal would be substantially similar to impacts identified for 2002 UGA FEIS Alternative 5. The 2024 proposal would include the same types, amounts and intensities of land uses in a similar layout, as under 2002 UGA FEIS Alternative 5. As with Alternative 5, the general aesthetic character of the site would change substantially under the 2024 Proposal, from vegetated and forested areas to urban density residential uses, a business park, and recreation and open space areas. Natural open space and vegetated perimeter buffers would be provided consistent with adopted conditions of approval and would minimize visual impacts from proposed development. No significant changes to the previously approved project are proposed, and no new or significantly different aesthetic impacts would occur. No changes to previously identified mitigation measures are necessary or warranted.

Light and Glare

Development under the 2024 Bullfrog Flats Proposal would include a similar layout and types of land uses identified under 2002 UGA FEIS Alternative 5, as well as the same number of residential units. Development under the proposal would comply with the Development Agreement conditions for lighting and perimeter site buffers which would minimize potential light and glare impacts. Development under the 2024 Bullfrog Flats Proposal would also comply with the conditions of approval and Development Agreement, which include Dark Sky standards for the type and intensity of lighting and would minimize sky glow and light spillage. No new or different significant adverse impacts from light and glare would be anticipated with the 2024 Bullfrog Flats Proposal and no additional mitigation measures would be necessary.

Section 3.3

POPULATION, HOUSING, AND EMPLOYMENT

Prior Environmental Analysis

Population

The 2002 UGA FEIS estimated the buildout population of the Bullfrog Flats UGA (Alternative 5) as 2,945 persons. The UGA FEIS estimate assumed 1,334 housing units (excluding 50 units of affordable housing), an average of 2.4 persons per household (using OFM data), and 92% occupancy. This population estimate was a key component of the FEIS impact analysis for several elements of the environment that used population-based ratios (e.g., 2 police officers per 1,000 population) to estimate demand for Public Services and Utilities.

The current Cle Elum Comprehensive Plan is based on a total planning population of 2,750 in 2037, which is approximately 500 people greater than estimated 2024 population. Buildout of the Bullfrog Flats Project by that date, therefore, would likely result in the City exceeding its population allocation. Population growth, or exceeding the Comprehensive Plan's target, is not in itself a significant or an adverse impact, assuming that the City plans for its expected population growth. The City is required to update its Comprehensive Plan by 2026 and will plan for the updated population allocation provided by the Kittitas County Countywide Planning Policies. Any adjustment that is appropriate to address the planned buildout of Bullfrog Flats can be made at that time. It should also be noted that GMA population allocations are targets that must be used for planning purposes to ensure that sufficient capacity exists to accommodate planned growth population, but they are not interpreted to establish a limit or cap on growth.

Housing

The approved master plan includes a maximum of 1,334 housing units, comprised of 810 single family units and 524 multifamily units on 221 gross acres of land. At least 150 of the multifamily units are required to remain rental units for a period of 20 years. To help meet the need for affordable housing, the property owner is also required to dedicate 7.5 usable acres to the City or a non-profit housing entity for the development of 50 units of affordable housing. This housing is to be affordable to households earning less than 60% of the area median income. These units would not count towards the project's maximum.

Employment

2002 UGA FEIS Alternative 5 assumed buildout of a 950,000 gross sq. ft. (gsf) business park on a 75-acre site over a 30-year period. Employment generated by development and operation of the business park was analyzed in the 2002 UGA FEIS and was directly determined based on the size of the business park (950,000 gsf). Based on the size of the business park it was anticipated that Alternative 5 would generate approximately 427 employees by year 10 and approximately 1,647 employees by year 30.

EIS Addendum – 2024 Bullfrog Flats Proposal

Population

The 2024 Bullfrog Flats Proposal includes the same number and mix of residential units as identified under 2002 UGA FEIS Alternative 5 (1,334 residential units). Recent estimates of household size vary depending on the source of data. The 2020 Census estimated average household size in Kittitas County and Cle Elum as 2.2. Applying this average to the 1,334 units approved for Bullfrog Flats, and conservatively assuming 100% occupancy, equates to a population of 2,935, slightly less than what was assumed in the FEIS. However, OFM's April 2024 official population estimates reflect an average household size of 1.9 persons per household for the City (population of 2,265 and 1,184 dwelling units); Kittitas County household size is almost identical. Applying this average household size, and assuming 100% occupancy, equates to a buildout population of 2,535 persons, which is approximately 14% less than assumed in the FEIS (2,945 persons).

These estimates provide a snapshot of local conditions at a given point in time. How population growth and household size may change in the future will reflect larger national events and trends and cannot be accurately predicted. However, in the context of available data and the SEPA review that has been conducted for the Cle Elum UGA, the 2024 Bullfrog Flats Proposal is likely to result in roughly the same or incrementally lower impacts to population as 2002 UGA FEIS Alternative 5. A lower buildout population would also generally equate to reduced impacts to elements of the environment that are estimated using a population-based standard, including most public services and utilities.

Housing

The 2024 Bullfrog Flats Proposal includes the same quantities and mix of housing units as required in the UGA conditions of approval and Development Agreement. The original analysis of environmental impacts associated with constructing this amount and type of housing was updated in the 2020/2021 and 2023 environmental documents. No new or significantly different housing impacts would occur and no changes to previously identified mitigation measures are warranted.

The 2024 Proposal would dedicate a useable 7.5-acre site to the City or non-profit for development of 50 affordable housing units. Alternatively, the applicant has also expressed an interest in possibly constructing the affordable units. The affordable units would be targeted to households earning less than 60% of area median income (AMI) on an annual basis. Currently AMI is approximately \$66,800 in Kittitas County and \$56,645 in Cle Elum (U.S. Census Bureau); 60% of AMI is \$40,080 for Kittitas County or \$33,987 for Cle Elum. (It is noted that federal and state housing agencies typically adjust AMI to reflect household size.) The rule of thumb used to estimate affordability is that a household should spend no more than approximately 30% of its gross income on housing (rent/mortgage, utilities), which would equate to \$12,024 annually/\$1,002 monthly in Kittitas County overall, or \$10,196 annually/\$850 in Cle Elum.

The applicant generally constructs what is referred to as “middle housing,” which includes urban density housing of various types that is more affordable to moderate income households. The applicant’s for-sale residential units generally fall in the \$400,000-\$600,000 range; See the discussion in the Fiscal Conditions section (Section 3.9) and **Appendix F**. Data from Zillow on October, 2024 home sales in Cle Elum indicates sales prices ranging from \$375,000 to \$1.3 million, with a median of \$850,000.

Employment

The 2024 Bullfrog Flats Proposal identifies the same approximately 75-acre area for development of a future business park. Development of the business park area would occur in future phases and would be consistent with the conditions of approval identified in the Development Agreement, including condition No. 17 which limits commercial and light industrial uses to a maximum of 950,000 gsf and condition No. 18 which identifies development standards for the business park. Assuming an average of 2 employees per 1,000 gsf of business park, which is a commonly used industry rule of thumb, this land use could generate approximately 1,900 jobs at buildout. See the discussion in the Fiscal Conditions section (Section 3.9) and **Appendix F**. It is acknowledged that the business park land use category includes a wide variety of operations, and estimated employment could be somewhat higher or lower depending on the actual businesses locating there.

Residential buildout under the 2024 Bullfrog Flats Proposal is assumed to be approximately 15 years; however, it may not be feasible to develop and market all of the business park space in the Cle Elum UGA over a 15-year period. Note that the 2002 UGA approval assumed a 30 year buildout period. To reflect this uncertainty, the Transportation (**Section 3.6**) and Fiscal Conditions (**Section 3.9**) analyses considered two scenarios: (1) development of 450,000 sq. ft. of business park by 2037, which reflects the same rate of development as assumed for the 2002 UGA FEIS within the current proposal’s condensed buildout period; and (2) development of no business park. The latter scenario will identify how business park development affects the project’s fiscal balance. Development of 450,000 gsf would generate approximately 900 jobs.

To reiterate, these alternative assumptions are for purposes of analysis, and the applicant intends to develop the Bullfrog Flats site as approved. It is noted that the Bullfrog Flats Development Agreement condition of approval No. 12 E anticipated that insufficient market support might exist for full business park development and identified a process to modify the master site plan and conditions of approval, if necessary. Changes in land use may be considered a major modification according to the DA, which would entail additional environmental review and City Council action.

With the provision of equivalent area for future business park development (75 acres), reasonable assumptions about average employment generation, and compliance with the Development Agreement conditions of approval, no new or significantly different employment impacts would be anticipated and no changes to previously identified mitigation measures are warranted.

Section 3.4

CULTURAL RESOURCES

Prior Environmental Analysis

The cultural resources analysis in the 2002 UGA FEIS (Section 3.13) was based on a comprehensive cultural resources study prepared for Trendwest Resorts and the Yakama Nation by Archaeological Frontiers (*A Land Use History of the Proposed MountainStar Resort: The Results of a Cultural Resource Survey along the Lower Cle Elum River*, Churchill and Griffin 1998). The study included surveys of Trendwest's properties, including both the Suncadia resort and the UGA sites. The study, which is summarized in the 2002 UGA FEIS, identified six prehistoric archaeological sites on the UGA property, consisting primarily of lithic scatters. The survey generally identified one "cultural constraint area" with a high potential for the presence of resources. In addition, 16 historic sites were identified, most of which were refuse scatters; none were considered eligible for listing on the Federal register. Off-site resources include the Roslyn Historic District and an individual building within the district, the Cle Elum Cemetery and an historic building located northeast of the UGA. Impacts identified in the 2002 UGA FEIS include potential disturbance of on-site resources from development activity, and potential impacts to off-site resources from cumulative induced growth.

The 2002 UGA FEIS identifies the Cle Elum UGA as within the aboriginal use area of Native Americans who are now part of the Confederated Tribes and Bands of the Yakama Nation (2002 EIS, page 3.13-2). These and other lands were ceded to the ownership of the U.S. government under the Yakama Treaty of June 9, 1855 (12 Stat. 951), which created the Yakama Reservation. Under the terms of the treaties and other applicable statutes, members of the Yakama Nation reserved a variety of use rights in the ceded areas, which typically include fishing, hunting, gathering activities, and the use of sacred and religious sites. (Ibid)

The 2021 SEIS provided updated information about recorded historic and archaeological resources located on and within one mile of the UGA. It conducted additional field investigations, including geotechnical exploration pits, pedestrian surveys and shovel probes focused on proposed development areas and areas identified by DAHP's predictive model as having a high probability for containing cultural resources. These investigations did not identify any previously unrecorded historic-era or precontact cultural resources and did not find any evidence to suggest a high potential for as-yet unrecorded archaeological deposits within proposed development areas. No significant impacts to cultural resources were identified. However, based on the test pits, on-site construction monitoring was recommended for ground disturbing activities with potential to intersect Holocene geologic deposits, observed up to 8.5 feet below ground surface. In addition, additional field investigation was recommended for a portion of the business park property prior to development.

The 2023 SEIS Addendum documented additional survey work of a portion of the business park property, which was then proposed as a retail center by Sun Communities. The investigation, which was conducted by the Yakama Nation Cultural Resource Program, included pedestrian survey and sub-surface testing. No cultural resources were identified, and no further investigation was recommended at that time.

Mitigation Measures identified in the 2002 UGA FEIS were incorporated into and expanded upon in the DA and conditions of approval (No. 80-82). Requirements included the following:

- Prohibition of any measures that would encourage access or discovery of significant cultural resource sites within the Cle Elum River undeveloped open space area.
- Provision of notice to the Yakama Nation, and an opportunity to comment on all proposed preliminary plats, binding site plans, or building and grading permits on all lands within the cultural resource areas identified in the cultural resource survey. Additional survey and additional mitigation, including adjusting development plans, could be required if the Yakama Nation provided substantial evidence that a proposed development area has been identified as a significant cultural resource area.
- Compliance with all applicable requirements of RCW 27.44, Indian Graves and Records, and RCW 27.53, Archaeological Sites and Resources.
- An inadvertent discovery plan; training of contractors in appropriate techniques for addressing inadvertent discovery of any artifacts during construction.

Based on review of City files, formal notices have been provided to the Yakama Nation, Snoqualmie Tribe and Confederated Tribes of the Colville Reservation for all published SEPA documents, scoping and commenting opportunities, and of applications for prior and current proposals on the Bullfrog Flats site. The Yakama Nation has been consistently involved in cultural resource studies and permitting for prior projects on the Bullfrog Flats site; that involvement is reflected in adopted mitigation measures, agreements and conservation easements affecting portions of the property. No comments were received from either the Colville Confederated Tribes or Snoqualmie Tribes on the 2002 UGA EIS or for subsequent prior applications or SEPA documents for related proposals on the UGA site.

EIS Addendum – 2024 Bullfrog Flats Proposal

Based on consultation with cultural resource professionals, additional field work was not considered to be necessary for the 2024 Bullfrog Flats Proposal. This conclusion was based on the existing extensive field work, analysis and mitigation measures identified in the Churchill and Griffin report, in prior SEPA documents and in the 2002 DA's conditions of approval, which are applicable to the Bullfrog Flats Proposal; and considering the protection provided by the 2000 Cooperative Agreement (between the Yakama Nation, WDFW and Trendwest Resorts) and Conservation Easements that are applicable to the Cle Elum River

Corridor Open Space and the Managed Open Space. Together, these conditions, requirements and limitations together would apply to the 2024 Bullfrog Flats Proposal and would protect known and potential cultural resources located on the Bullfrog Flats site, including cultural plants, by limiting land uses, access and potential disturbance.

Comments submitted by the Colville Confederated Tribes on the Bullfrog Flats Proposal application, and consultation conducted during the SEPA process for this Addendum, noted the general presence of certain plants on the site that have cultural, spiritual and/or traditional medical value to Native American tribes. Based on federal criteria, such plants could be categorized as Traditional Cultural Places (TCP) and potentially eligible for listing in the National Register of Historic Places. Locations associated with historic cultivation or gathering of culturally significant plants were not identified during consultation, possibly due to concerns about confidentiality. Consultation comments also expressed a desire to protect cultural plants and also to allow future access to the Colville Confederated Tribal members in perpetuity to harvest plants.

Based on prior cultural surveys and further investigations of DAHP's WISSARD database, no designated TCPs have been identified on or near the site. However, it is noted that prior site plant surveys have identified a few plant species that could be considered cultural plants as occurring or potentially occurring on the site. However, some species grow in locations that are currently protected by existing legal agreements or mitigation requirements that are applicable to the proposed project. For example, plants and other cultural resources located within riparian areas of the Bullfrog Flats site, including the shoreline of the Cle Elum River, are included within the Cle Elum River Corridor Open Space. Land uses, human activity and ground disturbance are limited within this area by the Cooperative Agreement, to which the Yakama Nation is a party, and a Conservation Easement. Other potential species of cultural plants are more dispersed throughout the site.

Existing conditions of approval (No. 80, 81, 82) provide protection of cultural resources, which would include culturally significant plants and traditional gathering locations. Existing provisions include the potential to modify site plans within locations that are believed to be "cultural areas" as identified by the Yakama Nation. To the extent that the Colville Confederated Tribes consider the same species of plants to be culturally significant, the cultural resource would be similarly protected by the applicable conditions of approval.

No new or different significant impacts to cultural resources have been identified and no additional mitigation relating to cultural plants is required or proposed concerning the presence or protection of cultural plants. The City of Cle Elum does not have the legal authority to grant or require access to individuals or entities to areas of the site that are subject to pre-existing legal agreements or recorded easements. Similarly, the City is not empowered to adjudicate competing claims or assertions regarding historic use areas or treaty rights.

Based on ongoing consultation, the Yakama Nation and Bullfrog Flats have agreed to pursue a Memorandum of Understanding (MOU) regarding the protection of cultural and environmental resources of the site and the potential for construction monitoring proximate to areas of the site considered to be culturally sensitive. This voluntary mitigation measure reads as follows:

The Applicant has committed to pursue a Memorandum of Understanding (MOU) with the Yakama Nation regarding the protection of Cultural Resources on the Bullfrog Flats project site. The Cultural Resources analyses in the SEIS and the Addendum do not identify any direct impacts to resources located on the project site. In addition, the defined open space corridor adjacent to the Yakima River is subject to a pre-existing formal agreement that protects cultural and environmental resources within the defined open space. Notwithstanding these conclusions, the Applicant understands and appreciates that the Yakama Nation defines “cultural resources” more broadly than archaeological artifacts, and that this definition encompasses the larger context of historical activities and environmental conditions, including effects on soils, water, fish and wildlife. The Applicant, therefore, agrees to pursue execution of an MOU with the Yakama Nation that will address the potential for monitoring construction activity proximate to culturally sensitive areas of the site, protocols to ensure ongoing protection of the site’s environmental resources, and any other issues of mutual concern to the parties.

Section 3.5 PARKS AND RECREATION

Prior Environmental Analysis

The 2002 UGA EIS described existing parks and recreation conditions on and in the vicinity of the Bullfrog Flats site and in the City as a whole (see 2002 UGA FEIS Section 3.13). The 2021 Supplemental EIS and 2023 SEIS Addendum included updates to existing parks and recreation conditions, including updates to City Park Plan targets and goals for parks and recreation facilities. Existing conditions have not changed significantly since these prior analyses.

In general, the analysis of parks and recreation impacts from the adopted UGA master site plan in the 2002 UGA FEIS (FEIS Alternative 5), utilized population-based standards (e.g., 6 acres of active parks per 1,000 population) for various types and amounts of City park and recreation facilities.

As indicated in **Section 3.3** (Population, Housing, and Employment), the 2002 UGA FEIS assumed a population of approximately 2,945 people for Alternative 5. For the purposes of this updated analysis, the required parks and recreation facilities for the 2024 Bullfrog Flats Proposal are calculated based on the estimated full buildout population of approximately 2,535 people, as discussed in **Section 3.3**, Population, Housing, and Employment.

Table 3.5-1 provides a summary of parks and recreation facilities identified based on current City of Cle Elum targets. It should be noted that several DA conditions related to parks and recreation have already been completed, fulfilled or committed to by a combination of New Suncadia, Sun Communities (e.g., dedication of land for a community park facility and partial funding) or the applicant. **Table 3.5-1** summarizes the remaining parks and recreation conditions of approval applicable to the Bullfrog Flats Proposal.

**Table 3.5-1
REQUIRED & PROPOSED PARKS & RECREATION FACILITIES**

Parks/Recreation Facility	City Park Plan Target/Goal	Dev. Agreement Requirements	2024 Proposal Proposed
Active parks	6 acres/1,000 people	18 acres ¹	Minimum of 19.6 acres ¹
Open space	9 acres/1,000 people	418 acres	546 acres
Tracks, trails, & connections	4 miles/1,000 people	Internal trails and connections to off-site trails ²	Approx. 10 miles

Source: City of Cle Elum Parks, Recreation, and Open Space Plan, 2018 and UGA EIS, 2002.

¹ 2002 UGA Includes an 18-acre man-made lake amenity and clubhouse and 11 acres for future recreational expansion (not included in calculations), and pocket/mini-parks ranging from 0.25 to 0.5-acres that meet a total standard of 0.5 acres/1,000 population. The Bullfrog Flats proposal includes a public 18-acre active recreation area, a minimum of 1.6 acres of private neighborhood/mini parks, and identifies 11 acres for future “recreational expansion.”

² The Development Agreement conditions of approval require trail connections to the off-site Coal Mines Trail, as well as internal trails and pedestrian circulation to connect proposed residential areas, the business park, schools, and adjacent areas of the City.

The Development Agreement conditions of approval also identify contingent recreational facilities/contributions that could be required if the required dedication of a site and funding for a community facility is not fulfilled. However, the community rec center site has been transferred to the City and payments towards construction of the facility have been made or committed. In addition, the Bullfrog Flats Project's proposed 18-acre park, which preliminary plans indicate could include multiple sports fields would also meet some of the facility needs described in condition of approval No. 38.

EIS Addendum - 2024 Bullfrog Flats Proposal

Updated analysis in the 2021 SEIS and 2023 SEIS Addendum included updated calculations of required parks and recreation facility based on guidelines in the City of Cle Elum's updated Parks, Recreation and Open Space Plan (2018).

Consistent with the Development Agreement, the proposal would provide 18 acres of public park space, and a minimum of 1.56 acres of private neighborhood/mini parks within individual phases of the development. An 11-acre site for future recreation expansion is also identified. It should also be noted that consistent with the Development Agreement, each townhome unit and multifamily unit would include at least 48 sq. ft. of private open space per unit.

The 2024 Bullfrog Flats Proposal includes the same amount of housing units (1,334 total housing units) and split of single family and multi-family residences that was analyzed in the prior SEPA documents. However, as noted in Section 3.3 (Population, Housing, and Employment), based on recent household size population estimates (1.9 persons per household [OFM, 2024]) the 2024 Bullfrog Flats Proposal would generate a population of approximately 2,535 people, which is 14 percent less than identified in the 2002 FEIS. The proposal would, therefore, provide park and recreational facilities at a proportionately higher per capita rate. Any indirect impacts from increased use of existing City park facilities by Bullfrog Flats residents would also be less than estimated for the 2002 UGA FEIS. See **Table 3.5-1** for a summary of the required and proposed parks and recreation facilities under the 2024 Bullfrog Flats Proposal.

The analysis indicates that demand for and impacts to parks and recreation facilities would be anticipated to be similar to or less than for the 2002 UGA, and no new or different significant adverse impacts to parks and recreation would occur from the development of the 2024 Bullfrog Flats Proposal. No additional mitigation measures would be necessary.

Section 3.6 TRANSPORTATION

Introduction

This section of the 2024 EIS Addendum summarizes the transportation study of the proposed 2024 Bullfrog Flats Proposal prepared by Transportation Engineering Northwest (TENW) in December 2024. The study updates information in the *2002 Cle Elum UGA FEIS*, *2021 SEIS*, and the *2023 SEIS Addendum*. Each of these documents evaluates the transportation impacts of “Alternative 5”, which is the Bullfrog Flats UGA Master Site Plan as approved by the City in 2002. The 2021 SEIS and 2023 Addendum updated the prior analyses based on then current conditions. The present transportation study evaluates the current *2024 Bullfrog Flats Project* application in the context of the previously referenced environmental documents and the approved Bullfrog Flats Master Plan and Development Agreement.

The full Transportation study, including all figures, tables and calculations, is included as **Appendix D** of this EIS Addendum. To help streamline and focus this summary, some tables related to Friday and Sunday summer week-end pm peak hour LOS conditions are omitted from this section of the Addendum; however, all tables and graphics for these time periods are included in **Appendix D**.

Study Scope, Analysis Time Periods, and Forecast Years

The scope of this transportation analysis is the same as established for the *2021 Final SEIS*, and was based on the following consultation and input: (1) *2002 Cle Elum UGA FEIS* scope of work; (2) public and agency comments received during the 2020/2021 SEIS scoping process; (3) project trip generation estimates; (4) information about existing transportation conditions; and (5) consultation with staff from the City of Cle Elum, Kittitas County, and the Washington State Department of Transportation (WSDOT).

A total of 27 study intersections were studied, plus the proposed site accesses on Bullfrog Road and State Route (SR) 903. Additionally, level of service (LOS) was evaluated along several roadway segments in downtown Cle Elum and Kittitas County, including but not limited to Bullfrog Road, SR 903, and the I-90 ramps.

Consistent with the methodology used in the 2021 SEIS and 2023 Addendum traffic analysis, peak summer season traffic was evaluated during the following time periods:

- Weekday PM peak hour (highest one-hour volumes between 3:00 and 6:00 p.m.)
- Friday PM peak hour (highest one-hour volumes between 2:00 and 4:00 p.m.)
- Sunday PM peak hour (highest one-hour volumes between 3:00 and 5:00 p.m.)

Note that to help simplify and focus on conditions during the weekday summer peak hour, the quantity and detail of tables incorporated into this section of the Addendum for the Friday and Sunday PM peak hours have been reduced. Please refer to the full report in **Appendix D** for more detailed information about other peak hours.

Future years used for the analysis are 2032 and 2037. *Year 2032* represents an interim year at the approximate mid-point of buildout of the *Bullfrog Flats Project*. *Year 2037* represents estimated full residential buildout and one-half of the business park. (An alternative scenario for business park buildout is also evaluated.) Both analysis years include background growth. *Year 2037* is consistent with the current planning horizon of the City of Cle Elum and Kittitas County Comprehensive Plans. Information about the transportation system, including population projections and planned improvements, is not currently available beyond 2037.

Affected Environment

Study Area

The Bullfrog Flats Project site is served by I-90 to the south, Bullfrog Road to the northwest and southwest, SR 903 (2nd Street) to the northeast, and Douglas Munro Blvd to the southeast. The existing transportation study area and roadway network providing access to the site is shown in **Appendix D**. The 27 study intersections and their corresponding jurisdiction are as follows:

1. Bullfrog Road / I-90 Eastbound Ramps – WSDOT
2. Bullfrog Road / I-90 Westbound Ramps – WSDOT
3. Bullfrog Road / Tumble Creek Drive – Kittitas County
4. Bullfrog Road / Suncadia Trail – Kittitas County
5. Bullfrog Road / Firehouse Road – Kittitas County
6. Bullfrog Road / W 2nd Street (SR 903) – WSDOT
7. Denny Ave / W 2nd Street (SR 903) – WSDOT
8. Ranger Station Road / Miller Avenue / W 2nd Street (SR 903) – WSDOT
9. N Pine Street / W 2nd Street (SR 903) – WSDOT
10. Douglas Munro Blvd / Ranger Station Road – Cle Elum
11. Douglas Munro Blvd / W 1st Street – Cle Elum
12. Pine Street / W 1st Street – Cle Elum
13. N Stafford Avenue / W 2nd Street (SR 903) – WSDOT
14. S Cle Elum Way / Stafford Avenue / W 1st Street – Cle Elum
15. N Oakes Avenue / W 2nd Street (SR 903) – WSDOT
16. N Oakes Avenue / W 1st Street (SR 903) – WSDOT
17. Pennsylvania Ave / 2nd Street – Cle Elum
18. Pennsylvania Ave / 1st Street (SR 903) – WSDOT
19. Oakes Avenue / I-90 Westbound Off-Ramp – WSDOT
20. Oakes Avenue / I-90 Eastbound On-Ramp – WSDOT
21. SR 903 / Pennsylvania Avenue – WSDOT
22. SR 903 / Pacific Avenue – WSDOT

- 23. Rock Rose Drive / Morrel Road / SR 903 – WSDOT
- 24. SR 903 / SR 903 Ramp (SUNDAY ONLY) – WSDOT
- 25. White Road Interchange / I-90 Westbound Ramps (SUNDAY ONLY) – WSDOT
- 26. White Road Interchange / I-90 Eastbound Ramps (SUNDAY ONLY) – WSDOT
- 27. SR 970 / SR 970 Ramp (SUNDAY ONLY) – WSDOT

Traffic Volumes

Existing 2024 traffic volumes were collected in mid-July 2024 (peak summer conditions). The detailed traffic data sheets are included in **Appendix D**. **Appendix D** also illustrates existing weekday PM peak hour traffic volumes, existing Friday PM peak hour traffic volumes, and existing Sunday PM peak hour traffic volumes.

The ‘Baseline’ (without project) traffic forecasts represent peak summer conditions including expected background growth of housing and employment in Cle Elum and Kittitas County, and continued buildout of Suncadia and City Heights development (vested projects), but without development of the Bullfrog Flats Project. Future years 2032 and 2037 ‘Baseline’ traffic volume estimates applies a 2.0% annual growth rate to the existing 2024 peak summer traffic volumes and added traffic volumes associated with Suncadia and City Heights. The 2.0% annual growth rate was calculated based on a comparison of year 2019 (summer peak) traffic volumes to existing year 2024 (summer peak) traffic volumes at the study intersections. The estimated future volumes associated with Suncadia assumed an average construction rate of 120 units per year to 2037, which reflects the average of the past 6 years of development. The methodology supporting this estimate, along with calculated trip generation based on July 2024 traffic counts, is described in **Appendix D**. City Heights was assumed to build out by 2037.

The 2032 and 2037 ‘Baseline’ traffic volumes for all studied peak hours are included in **Appendix D**.

Intersection Level of Service (LOS)

The adopted Level of Service (LOS) standard at all study intersections is LOS C, as identified in the Transportation Elements of the City of Cle Elum Comprehensive Plan (May 2019), the Kittitas County Comprehensive Plan (June 2019), and WSDOT standards. Intersection LOS analyses were conducted at the study intersections for existing (2024) conditions during the weekday PM peak hour, Friday PM peak hour, and Sunday PM peak hour during the summer peak period, and is summarized in **Table 3.6-1** below. The LOS methodology and calculations are included in **Appendix D**.

Intersection LOS was calculated using the methodology and procedures outlined in the *Highway Capacity Manual* (HCM 7th Edition) and WSDOT Synchro Protocol using the *Synchro 12* traffic analysis software for signalized and stop-controlled intersections and *Sidra 9* traffic analysis software for roundabouts. Existing signal timing used in the analysis was provided by WSDOT. A summary of the existing intersection LOS analysis is included in

Table 3.6-1 below and the LOS results are discussed in detail following the table. **Bolded** cells indicate intersections that do not comply with adopted LOS standards.

Table 3.6-1
EXISTING (2024) INTERSECTION LOS SUMMARY (SUMMER)

Study Intersection	LOS Standard	Existing Conditions (Summer Peak)					
		Weekday PM Peak Hour		Friday PM Peak Hour		Sunday PM Peak Hour	
		LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹
Signalized							
11. Douglas Munro Blvd / W 1 st St	C	B	15.5	B	16.2	B	14.8
14. S Cle Elum Way / Stafford / W 1 st St	C	B	13.7	A	9.6	A	8.9
16. N Oakes Ave / W 1 st St (SR 903)	C	B	12.4	A	9.2	A	8.2
18. Pennsylvania Ave / 1 st St (SR 903)	C	A	5.2	A	4.3	A	3.9
Roundabout							
4. Bullfrog Rd / Suncadia Trail	C	A	5.4	A	5.3	A	4.4
6. Bullfrog Rd / W 2 nd St (SR 903)	C	A	6.9	A	7.0	A	6.7
All-Way Stop-Controlled							
17. Pennsylvania Ave / 2 nd St	C	A	8.6	A	8.2	A	7.5
Two-Way Stop-Controlled²							
1. Bullfrog Rd / I-90 EB Ramps	C	B	14.0	B	12.1	B	10.5
2. Bullfrog Rd / I-90 WB Ramps	C	B	11.0	B	10.6	A	9.3
3. Bullfrog Rd / Tumble Creek Dr	C	B	12.6	B	12.7	B	10.4
5. Bullfrog Rd / Firehouse Rd	C	B	13.4	B	13.7	B	10.9
7. Denny Ave / W 2 nd St (SR 903)	C	C	16.1	B	14.4	B	12.7
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	C	D	25.4	C	20.7	B	13.3
9. N Pine St / W 2 nd St (SR 903)	C	C	18.4	C	15.5	B	12.6
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.9	A	8.3	A	7.6
12. Pine St / W 1 st St	C	D	28.6	D	33.0	C	24.3
13. N Stafford Ave / W 2 nd St (SR 903)	C	C	19.6	C	16.5	B	12.8
15. N Oakes Ave / W 2 nd St (SR 903)	C	B	14.3	B	13.0	B	11.4
19. Oakes Ave / I-90 EB Off-Ramp	C	A	9.0	A	9.1	A	9.2
20. Oakes Ave / I-90 EB On-Ramp	C	A	8.6	A	8.6	A	8.4
21. SR 903 / E Pennsylvania Ave	C	C	16.2	C	21.9	C	16.5
22. SR 903 / Pacific Ave	C	B	10.7	B	10.7	B	12.7
23. Rock Rose Rd / Morrel Rd / SR 903	C	B	10.5	B	12.4	B	11.6
24. SR 903 / SR 903 Ramp	C	Only analyzed for Sunday PM peak hour				C	18.2
25. White Road I/C / I-90 WB Ramps	C	Only analyzed for Sunday PM peak hour				B	10.9
26. White Road I/C / I-90 EB Ramps	C	Only analyzed for Sunday PM peak hour				A	9.4
27. SR 970 / SR 970 Ramp	C	Only analyzed for Sunday PM peak hour				D	32.0

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.

2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

The following two-way stop-controlled intersections currently exceed adopted LOS, as shown in **Table 3.6-1**:

Weekday Summer PM Peak Hour

- #8 - Ranger Sta Rd / Miller / W 2nd (SR 903) – LOS D
- #12 - Pine Street / W 1st Street – LOS D

Friday Summer PM Peak Hour

- #12 - Pine Street / W 1st Street – LOS D

Sunday Summer PM Peak Hour

- #27 - SR 970 / SR 970 Ramp – LOS D

Future 'Baseline' Intersection LOS

Table 3.6-2 summarizes future 'Baseline' analysis results at the study intersections for the summer weekday PM peak hour in future years 2032 and 2037. Bolded cells indicate non-compliant intersections. As noted previously, tables summarizing LOS results for the Friday and Sunday PM peak hours during the peak summer period are included in **Appendix D** but are not included in this section of the Addendum. However, the Addendum narrative does list any intersections that exceed LOS C during these peak hour periods. This same approach to reporting peak hour results will be used in the discussion of project impacts below.

Based on review of current City of Cle Elum, Kittitas County, and WSDOT transportation planning documents, there are no planned, fully-funded transportation improvements within the project study area. Therefore, the future LOS analysis is based on existing intersection control and channelization.

Table 3.6-2
FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER)

Study Intersection	LOS Standard	Weekday PM Peak Hour Conditions (Summer Peak)			
		2032 'Baseline'		2037 'Baseline'	
		LOS ¹	Delay ¹	LOS ¹	Delay ¹
Signalized					
11. Douglas Munro Blvd / W 1 st St	C	B	17.3	B	19.8
14. S Cle Elum Way / Stafford / W 1 st St	C	B	14.8	B	16.0
16. N Oakes Ave / W 1 st St (SR 903)	C	B	14.0	B	16.5
18. Pennsylvania Ave / 1 st St (SR 903)	C	A	5.4	A	5.6
Roundabout					
4. Bullfrog Rd / Suncadia Trail	C	A	7.5	B	10.0
6. Bullfrog Rd / W 2 nd St (SR 903)	C	A	8.1	A	8.9
All-Way Stop-Controlled					
17. Pennsylvania Ave / 2 nd St	C	B	10.4	B	12.8

Two-Way Stop-Controlled ²					
1. Bullfrog Rd / I-90 EB Ramps	C	C	19.8	E	39.0
2. Bullfrog Rd / I-90 WB Ramps	C	B	12.1	B	13.9
3. Bullfrog Rd / Tumble Creek Dr	C	C	16.9	C	24.3
5. Bullfrog Rd / Firehouse Rd	C	C	18.7	D	25.7
7. Denny Ave / W 2 nd St (SR 903)	C	C	22.0	D	30.3
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	C	F	88.1	F	> 100
9. N Pine St / W 2 nd St (SR 903)	C	D	32.8	F	83.0
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	8.8	A	9.6
12. Pine St / W 1 st St	C	E	38.5	F	76.2
13. N Stafford Ave / W 2 nd St (SR 903)	C	F	50.2	F	> 100
15. N Oakes Ave / W 2 nd St (SR 903)	C	C	22.4	E	38.5
19. Oakes Ave / I-90 EB Off-Ramp	C	A	9.2	A	9.3
20. Oakes Ave / I-90 EB On-Ramp	C	A	8.6	A	8.6
21. SR 903 / E Pennsylvania Ave	C	C	22.0	D	28.1
22. SR 903 / Pacific Ave	C	B	12.1	B	13.2
23. Rock Rose Rd / Morrel Rd / SR 903	C	B	11.6	B	12.6

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.

2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Non-Compliant Intersections

Weekday Summer PM Peak Hour

- #1 – Bullfrog Rd / I-90 EB Ramps – LOS E (2037)
- #5 – Bullfrog Rd / Firehouse Rd – LOS D (2037)
- #7 – Denny Ave / W 2nd St (SR 903) – LOS D (2037)
- #8 – Ranger Sta Rd / Miller / W 2nd St (SR 903) – LOS F (2032)
- #9 – N Pine St / W 2nd St (SR 903) – LOS D (2032) and LOS F (2037)
- #12 - Pine Street / W 1st Street – LOS E (2032) and LOS F (2037)
- #13 – N Stafford Ave / W 2nd St (SR 903) – LOS F (2032)
- #15 – N Oakes Ave / W 2nd St (SR 903) – LOS E (2037)
- #21 – SR 903 / E Pennsylvania Ave – LOS D (2037)

Friday Summer PM Peak Hour

- #7 – Denny Ave / W 2nd St (SR 903) – LOS D (2037)
- #8 – Ranger Sta Rd / Miller / W 2nd St (SR 903) – LOS F (2032)
- #9 – N Pine St / W 2nd St (SR 903) – LOS D (2032) and LOS F (2037)
- #12 - Pine Street / W 1st Street – LOS E (2032) and LOS F (2037)
- #13 – N Stafford Ave / W 2nd St (SR 903) – LOS E (2032) and LOS F (2037)
- #15 – N Oakes Ave / W 2nd St (SR 903) – LOS D (2037)
- #21 – SR 903 / E Pennsylvania Ave – LOS D (2032) and LOS E (2037)

Sunday Summer PM Peak Hour

- #8 – Ranger Sta Rd / Miller / W 2nd St (SR 903) – LOS D (2037)
- #12 - Pine Street / W 1st Street – LOS D (2032)

- #13 – N Stafford Ave / W 2nd St (SR 903) – LOS D (2037)
- #24 – SR 903 / SR 903 Ramp – LOS D (2037)
- #27 – SR 970 / SR 970 Ramp – LOS D (2032) and LOS E (2037)

Crash History and Traffic Safety

Crashes at the study intersections were reviewed and summarized for the most recent five-year period from January 1, 2019 to December 31, 2023. Crash data was provided by WSDOT. Summaries of the crashes by year, crashes by severity, total, and annual average crashes are provided in **Table 3.6-3**.

As shown in **Table 3.6-3**, the majority of crashes at the study intersections over the 5-year period were classified as either “no injury” or “minor/possible injury”, with 1 crash classified as “major injury.”

Table 3.6-3
CRASH DATA SUMMARY (2019 TO 2023)

Study Intersection	Crashes by Year					Crashes by Severity			5-Year Total Crashes	Average Annual Crashes
	2019	2020	2021	2022	2023	Major Injury	Minor/Possible Injury	No Injury		
Signalized										
11. Douglas Munro Blvd / W 1 st St	1	5	0	0	0	0	3	3	6	1.20
14. S Cle Elum Way / Stafford / W 1 st St	1	0	1	2	0	1	1	2	4	0.80
16. N Oakes Ave / W 1 st St (SR 903)	0	0	0	1	0	0	0	1	1	0.20
18. Pennsylvania Ave / 1 st St (SR 903)	1	0	0	0	0	0	1	0	1	0.20
Roundabout										
4. Bullfrog Rd / Suncadia Trail	1	0	0	1	0	0	1	1	2	0.40
6. Bullfrog Rd / W 2 nd Street (SR 903)	1	1	1	0	1	0	1	3	4	0.80
All-Way Stop-Controlled										
17. Pennsylvania Ave / 2 nd St	1	0	0	0	0	0	0	1	1	0.20
Two-Way Stop-Controlled										
1. Bullfrog Rd / I-90 EB Ramps	0	0	0	1	1	0	0	2	2	0.40
2. Bullfrog Rd / I-90 WB Ramps	2	1	3	0	0	0	2	4	6	1.20
3. Bullfrog Rd / Tumble Creek Dr	0	0	1	0	0	0	1	0	1	0.20
5. Bullfrog Rd / Firehouse Rd	0	1	0	0	0	0	0	1	1	0.20
7. Denny Ave / W 2 nd Street (SR 903)	0	0	0	1	0	0	1	0	1	0.20
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	2	0	0	1	0	0	0	3	3	0.60
9. N Pine St / W 2 nd St (SR 903)	0	1	0	0	0	0	0	1	1	0.20
10. Douglas Munro Blvd / Ranger Sta Rd	1	0	0	0	0	0	1	0	1	0.20
12. Pine St / W 1 st St	2	1	0	0	1	0	1	3	4	0.80
13. N Stafford Ave / W 2 nd St (SR 903)	0	0	0	0	0	0	0	0	0	0.00

15. N Oakes Ave / W 2 nd St (SR 903)	0	0	0	0	1	0	0	1	1	0.20
19. Oakes Ave / I-90 EB Off-Ramp	1	0	0	0	1	0	1	1	2	0.40
20. Oakes Ave / I-90 EB On-Ramp	0	0	0	0	0	0	0	0	0	0.00
21. SR 903 / E Pennsylvania Ave	0	1	1	0	0	0	2	0	2	0.40
22. SR 903 / Pacific Ave	0	1	0	0	0	0	0	1	1	0.20
23. Rock Rose Rd / Morrel Rd / SR 903	0	1	0	0	0	0	0	1	1	0.20
24. SR 903 / SR 903 Ramp	2	0	1	2	1	0	1	5	6	1.20
25. White Road I/C / I-90 WB Ramps	0	0	2	0	1	0	1	2	3	0.60
26. White Road I/C / I-90 EB Ramps	0	1	2	1	0	0	0	4	4	0.80
27. SR 970 / SR 970 Ramp	0	2	1	0	1	0	2	2	4	0.80

EIS Addendum – 2024 Bullfrog Flats Proposal

As part of the transportation analysis, the 2024 Bullfrog Flats Proposal was evaluated for two (2) land use scenarios summarized in **Table 3.6-4** below.

Table 3.6-4
LAND USE SUMMARY

Land Use	Scenario A		Scenario B	
	2032	2037	2032	2037
<u>Residential Uses:</u> ¹				
Single-Family Detached	405 DU	810 DU	405 DU	810 DU
Single-Family Attached	187 DU	374 DU	187 DU	374 DU
Multi-Family	150 DU	150 DU	150 DU	150 DU
<u>Commercial Uses:</u> ¹				
Business Park	250,000 SF	475,000 SF	0	0

1. DU = dwelling units, SF = square feet.

Trip Generation

The gross trip generation estimates for the *Bullfrog Flats Project* were based on methodologies and standard trip rates documented in the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th edition) for Land Use Code (LUC) 210 (Single-Family Detached Housing), LUC 215 (Single-Family Attached Housing), LUC 220 (Multifamily Housing (Low-Rise)), and LUC 770 (Business Park).

Tables 3.6-5 and 3.6-6 summarize the trip generation estimates for the two Bullfrog Flats Project development scenarios for the weekday, Friday, and Sunday PM peak hours in future years 2032 and 2037. The detailed trip generation calculations are provided in **Appendix D**. It should be noted that the trip generation estimates for the *Bullfrog Flats*

Project development are the same for the weekday PM peak hour and the Friday PM peak hour since Friday is considered to be a weekday per ITE methodology.

Table 3.6-5
BULLFROG FLATS PROJECT TRIP GENERATION SUMMARY (SCENARIO A)

Year	Land Use/Size	New Trips Generated					
		Weekday and Friday PM Peak Hour			Sunday PM Peak Hour		
		In	Out	Total	In	Out	Total
2032	405 Single-Family Detached Units						
	187 Single-Family Attached Units	436	454	890	312	261	573
	150 Multifamily Units						
	250,000 SF Business Park						
2037	810 Single-Family Detached Units						
	374 Single-Family Attached Units	780	810	1,590	618	506	1,124
	150 Multifamily Units						
	475,000 SF Business Park						

Table 3.6-6
BULLFROG FLATS PROJECT TRIP GENERATION SUMMARY (SCENARIO B)

Year	Land Use/Size	New Trips Generated					
		Weekday and Friday PM Peak Hour			Sunday PM Peak Hour		
		In	Out	Total	In	Out	Total
2032	405 Single-Family Detached Units						
	187 Single-Family Attached Units	351	212	563	308	257	565
	150 Multifamily Units						
	810 Single-Family Detached Units						
2037	374 Single-Family Attached Units	631	384	1,015	611	499	1,110
	150 Multifamily Units						

Project Trip Distribution and Assignment

The Bullfrog Flats Project PM peak hour project trips were distributed and assigned through the study intersections and site access intersections based on methodology and assumptions consistent with those described in the 2021 Final SEIS. Additionally, adjustments were made to the project trip distribution and assignment to account for a site access connection to Douglas Munro Blvd (consistent with the FEIS), which was assumed to

be constructed by 2032. The 2032 and 2037 trip assignments for both development scenarios during the weekday, Friday, and Sunday PM peak hours are in **Appendix D**.

Future Year Traffic Volumes and Intersection LOS

Future 2032 and 2037 traffic volumes with the *Bullfrog Flats Project* were estimated by adding the 'Baseline' traffic volumes for 2032 and 2037 to the *Bullfrog Flats Project* trip assignment for 2032 and 2037 (see **Appendix D**). The weekday with project traffic volumes are also shown for Scenarios A and B in **Appendix D**.

Intersection LOS analysis results at the study intersections with the *Bullfrog Flats Project* for future years 2032 and 2037 are summarized in **Table 3.6-7** for the weekday PM peak hour. Tables summarizing LOS results for the Friday and Sunday PM peak hours during the peak summer period are included in **Appendix D**; however, the Addendum narrative lists all intersections that exceed LOS C during these peak hour periods. **Bold** cells indicate non-compliant intersections.

Weekday Summer PM Peak Hour

As shown in **Table 3.6-7**, 10 of the 23 study intersections are expected to operate at non-compliant LOS by 2037 under either of the *Bullfrog Flats Project* development scenarios during the weekday summer PM peak hour. **Table 3.6-8** identifies the year by which each intersection is anticipated to operate at non-compliant LOS and whether the noncompliance is triggered by the *Bullfrog Flats Project* or is a 'Baseline' condition. The Mitigation Measures section of this analysis identifies potential improvements for non-compliant intersections.

Table 3.6-7
INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER)

2032														2037			
				With Bullfrog Flats Project Scenario A		With Bullfrog Flats Project Scenario B						With Bullfrog Flats Project Scenario A		With Bullfrog Flats Project Scenario B			
		'Baseline'						'Baseline'									
Study Intersection	LOS Standard	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹		
Signalized																	
11. Douglas Munro Blvd / W 1 st St	C	B	17.3	B	20.0	B	19.0	B	19.8	C	28.6	C	23.8				
14. S Cle Elum Way / Stafford / W 1 st St	C	B	14.8	B	15.3	B	15.0	B	16.0	B	18.0	B	17.0				
16. N Oakes Ave / W 1 st St (SR 903)	C	B	14.0	B	16.7	B	15.3	B	16.5	C	33.2	C	25.3				
18. Pennsylvania Ave / 1 st St (SR 903)	C	A	5.4	A	5.7	A	5.6	A	5.6	A	6.1	A	5.9				
Roundabout																	
4. Bullfrog Rd / Suncadia Trail	C	A	7.5	A	8.1	A	8.0	B	10.0	B	12.0	B	11.5				
6. Bullfrog Rd / W 2 nd St (SR 903)	C	A	8.1	A	8.5	A	8.4	A	8.9	B	10.4	A	9.9				
All-Way Stop-Controlled																	
17. Pennsylvania Ave / 2 nd St	C	B	10.4	B	11.7	B	11.1	B	12.8	C	19.9	C	15.6				
Two-Way Stop-Controlled ²																	
1. Bullfrog Rd / I-90 EB Ramps	C	C	19.8	D	28.8	C	24.4	E	39.0	F	> 100	F	84.5				
2. Bullfrog Rd / I-90 WB Ramps	C	B	12.1	B	13.4	B	13.1	B	13.9	C	18.3	C	17.1				
3. Bullfrog Rd / Tumble Creek Dr	C	C	16.9	C	21.3	C	19.6	C	24.3	F	50.0	E	37.9				
5. Bullfrog Rd / Firehouse Rd	C	C	18.7	C	18.5	C	18.8	D	25.7	D	25.9	D	26.1				
7. Denny Ave / W 2 nd St (SR 903)	C	C	22.0	D	30.3	D	26.3	D	30.3	F	70.4	E	47.7				
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	C	F	88.1	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100				
9. N Pine St / W 2 nd St (SR 903)	C	D	32.8	F	87.2	F	57.8	F	83.0	F	> 100	F	> 100				
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	8.8	B	10.9	B	10.1	A	9.6	C	18.3	B	14.1				
12. Pine St / W 1 st St	C	E	38.5	F	69.0	F	53.9	F	76.2	F	> 100	F	> 100				
13. N Stafford Ave / W 2 nd St (SR 903)	C	F	50.2	F	> 100	F	>100	F	> 100	F	> 100	F	> 100				
15. N Oakes Ave / W 2 nd St (SR 903)	C	C	22.4	E	37.3	D	29.9	E	38.5	F	> 100	F	> 100				
19. Oakes Ave / I-90 EB Off-Ramp	C	A	9.2	A	9.5	A	9.4	A	9.3	B	10.0	A	9.8				
20. Oakes Ave / I-90 EB On-Ramp	C	A	8.6	A	8.6	A	8.6	A	8.6	A	8.6	A	8.6				
21. SR 903 / E Pennsylvania Ave	C	C	22.0	D	27.7	D	25.4	D	28.1	E	48.0	E	38.6				
22. SR 903 / Pacific Ave	C	B	12.1	B	14.2	B	13.6	B	13.2	C	17.5	C	16.0				
23. Rock Rose Rd / Morrel Rd / SR 903	C	B	11.6	B	12.6	B	12.1	B	12.6	B	14.9	B	13.9				

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.

2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Table 3.6-8
INTERSECTIONS WITH NON-COMPLIANT LOS – WEEKDAY PM PEAK HOUR (SUMMER)

Study Intersection	Bullfrog Flats Project Scenario A			Bullfrog Flats Project Scenario B		
	Year	LOS	Trigger	Year	LOS	Trigger
1. Bullfrog Rd / I-90 EB Ramps	2032	D	Project	2037	E	Baseline
3. Bullfrog Rd / Tumble Creek Dr	2037	F	Project	2037	E	Project
5. Bullfrog Rd / Firehouse Rd	2037	D	Baseline	2037	D	Baseline
7. Denny Ave / W 2 nd St (SR 903)	2032	D	Project	2037	D	Project
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	2032	F	Baseline	2032	F	Baseline
9. N Pine St / W 2 nd St (SR 903)	2032	D	Baseline	2032	D	Baseline
12. Pine St / W 1 st St	2032	E	Baseline	2032	E	Baseline
13. N Stafford Ave / W 2 nd St (SR 903)	2032	F	Baseline	2032	F	Baseline
15. N Oakes Ave / W 2 nd St (SR 903)	2032	E	Project	2032	D	Project
21. SR 903 / E Pennsylvania Ave	2032	D	Project	2032	D	Project

Future Year Roadway LOS

Two roadway capacity evaluations were also completed along Bullfrog Road and along specific roadway segments identified in the *City of Cle Elum 2019-2037 Comprehensive Plan*.

Bullfrog Road Roadway Capacity

A roadway capacity evaluation was completed for roadway segments along Bullfrog Road in unincorporated Kittitas County. The roadway peak hour volume and LOS calculations are summarized in **Table 3.6-9** for the weekday, Friday, and Sunday PM peak hours during the peak summer period.

The roadway capacity evaluation along Bullfrog Road (Kittitas County roadway segments) is consistent with the Kittitas County LOS policy/standard for roadways and assumptions identified in the County's *2017 Comprehensive Plan*, which is based on Florida Department of Transportation (FDOT) 2012 QLOS Handbook tables for Developed Areas less than 5,000 population. The rural roadway LOS standard along Bullfrog Road is LOS C.

As shown in **Table 3.6-9**, all roadway segments along Bullfrog Road are expected to operate at compliant LOS during the summer weekday, Friday, and Sunday PM peak hours for future 2032 and 2037 conditions with either *Bullfrog Flats Project* scenario.

**Table 3.6-9
ROADWAY LOS SUMMARY (BULLFROG ROAD)**

Roadway Segment along Bullfrog Road ¹	2032						2037					
	'Baseline'		With Bullfrog Flats Project Scenario A		With Bullfrog Flats Project Scenario B		'Baseline'		With Bullfrog Flats Project Scenario A		With Bullfrog Flats Project Scenario B	
	Volume	LOS ²	Volume	LOS ²	Volume	LOS ²	Volume	LOS ²	Volume	LOS ²	Volume	LOS ²
WEEKDAY PM PEAK HOUR												
I-90 EB Ramps												
<i>North of</i>	518	B	589	B	565	B	631	B	759	B	716	B
<i>South of</i>	89	B	89	B	89	B	99	B	99	B	99	B
I-90 WB Ramps												
<i>North of</i>	761	B	912	C	862	C	956	C	1,226	C	1,138	C
<i>South of</i>	520	B	591	B	567	B	633	B	761	B	718	B
Tumble Creek Drive												
<i>North of</i>	758	B	918	C	865	C	942	C	1,228	C	1,134	C
<i>South of</i>	687	B	838	C	788	B	858	C	1,128	C	1,040	C
Suncadia Trail												
<i>North of</i>	882	C	974	C	955	C	1,109	C	1,279	C	1,241	C
<i>South of</i>	758	B	842	C	827	C	942	C	1,095	C	1,067	C
Firehouse Road												
<i>North of</i>	939	C	1,021	C	1,020	C	1,193	C	1,345	C	1,340	C
<i>South of</i>	928	C	1,017	C	1,014	C	1,182	C	1,345	C	1,337	C
SR 903												
<i>South of</i>	936	C	1,018	C	1,017	C	1,191	C	1,343	C	1,338	C
FRIDAY PM PEAK HOUR												
I-90 EB Ramps												
<i>North of</i>	479	B	550	B	526	B	578	B	706	B	663	B
<i>South of</i>	39	B	39	B	39	B	43	B	43	B	43	B
I-90 WB Ramps												
<i>North of</i>	765	B	916	C	866	C	943	C	1,213	C	1,125	C
<i>South of</i>	482	B	553	B	529	B	581	B	709	B	666	B
Tumble Creek Drive												
<i>North of</i>	745	B	905	C	852	C	908	C	1,194	C	1,100	C
<i>South of</i>	724	B	875	C	825	C	878	C	1,148	C	1,060	C
Suncadia Trail												
<i>North of</i>	842	C	934	C	915	C	1,040	C	1,210	C	1,172	C
<i>South of</i>	745	B	829	C	814	B	908	C	1,061	C	1,033	C
Firehouse Road												
<i>North of</i>	893	C	975	C	974	C	1,118	C	1,270	C	1,265	C
<i>South of</i>	875	C	964	C	961	C	1,100	C	1,263	C	1,255	C
SR 903												
<i>South of</i>	866	C	948	C	947	C	1,090	C	1,242	C	1,237	C
SUNDAY PM PEAK HOUR												
I-90 EB Ramps												
<i>North of</i>	278	B	326	B	325	B	325	B	419	B	418	B
<i>South of</i>	27	B	27	B	27	B	29	B	29	B	29	B
I-90 WB Ramps												
<i>North of</i>	544	B	645	B	643	B	636	B	835	C	832	C
<i>South of</i>	277	B	325	B	324	B	322	B	416	B	415	B
Tumble Creek Drive												
<i>North of</i>	545	B	652	B	650	B	637	B	847	C	844	C
<i>South of</i>	533	B	634	B	632	B	617	B	816	B	813	B
Suncadia Trail												
<i>North of</i>	593	B	672	B	671	B	706	B	857	C	856	C
<i>South of</i>	545	B	618	B	617	B	637	B	777	B	776	B
Firehouse Road												
<i>North of</i>	610	B	696	B	695	B	732	B	899	C	898	C
<i>South of</i>	609	B	699	B	698	B	731	B	906	C	905	C
SR 903												
<i>South of</i>	585	B	671	B	670	B	707	B	874	C	873	C

1. Bullfrog road is classified as a 2-lane rural roadway.

2. LOS = Level of Service. LOS based on Florida Department of Transportation methodology. Bold indicates does not meet LOS standard. (LOS B when volume < 820, LOS C when volume < 1,550, LOS D when volume < 2,190, LOS E when volume < 2,990.

City of Cle Elum Roadway Capacity

Roadway capacity was also evaluated consistent with the City of Cle Elum LOS policy for roadways and assumptions identified (refer to Table 4-4 of the *City of Cle Elum 2019-2037 Comprehensive Plan*). The roadway peak hour volume and LOS calculations are included in **Tables 3.6-10** through **3.6-12**. The LOS results are discussed below.

Weekday Summer PM Peak Hour

As shown in **Table 3.6-10**, the evaluated roadway sections are anticipated to operate at compliant levels of service (LOS C or better) during the summer weekday PM peak hour with either scenario of the *Bullfrog Flats Project*, with the exception of the following:

- W 2nd Street (SR 903) west of N Stafford Ave – LOS D by 2037 (with Scenario A only)
- W 1st Street east of Pine Street – LOS D by 2037 (with Scenario A only)

Friday Summer PM Peak Hour

As shown in **Table 3.6-11**, the evaluated roadway sections are anticipated to operate at compliant levels of service (LOS C or better) during the summer Friday PM peak hour with either scenario of the *Bullfrog Flats Project*, with the exception of the following:

- W 1st Street east of Pine Street – LOS D by 2037 (with Scenario A only)

Sunday Summer PM Peak Hour

As shown in **Table 3.6-12**, the evaluated roadway sections are anticipated to operate at compliant levels of service (LOS C or better) during the summer Sunday PM peak hour with either *Bullfrog Flats Project* scenario.

Table 3.6-10
ROADWAY LOS SUMMARY (CITY OF CLE ELUM COMPREHENSIVE PLAN) – WEEKDAY PM PEAK HOUR

						2032 Weekday									2037 Weekday								
						‘Baseline’			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B			‘Baseline’			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B		
Functional Class	Road Name	Direction of (E/O, W/O, S/O, N/O)	Nearest Crossroad	Number of Lanes	Idealized Roadway Capacity (vph) ¹	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²
Freeways	I-90 Eastbound Off-ramp (Exit 84)	to	W 1 st Street	1	1,200	506	42%	A	517	43%	A	515	43%	A	570	48%	A	589	49%	A	589	49%	A
	I-90 Westbound On-ramp (Exit 84)	from	W 1 st Street	1	1,200	287	24%	A	298	25%	A	292	24%	A	324	27%	A	343	29%	A	343	29%	A
	I-90 Westbound Off-ramp (Exit 84A)	to	N Oakes Ave	1	1,200	174	15%	A	234	20%	A	222	19%	A	200	17%	A	308	26%	A	308	26%	A
	I-90 Eastbound On-ramp (Exit 84A)	from	N Oakes Ave	1	1,200	272	23%	A	319	27%	A	294	25%	A	303	25%	A	385	32%	A	385	32%	A
	I-90 Eastbound On-ramp (Exit 80)	from	Bullfrog Road	1	1,200	194	16%	A	224	19%	A	208	17%	A	241	20%	A	296	25%	A	296	25%	A
	I-90 Westbound Off-ramp (Exit 80)	to	Bullfrog Road	1	1,200	147	12%	A	197	16%	A	187	16%	A	191	16%	A	278	23%	A	278	23%	A
Major Collector	SR 903 (W 1 st St) (Eastbound Only)	W/O	N Pennsylvania Ave	1	1,000	492	49%	A	558	56%	A	523	52%	A	559	56%	A	677	68%	B	677	68%	B
	SR 903 (W 2 nd St)	W/O	N Oakes Ave	2	2,000	906	45%	A	1,096	55%	A	1,021	51%	A	1,125	56%	A	1,461	73%	C	1,461	73%	C
	SR 903	W/O	N Stafford Ave/ S Cle Elum Way	2	2,000	1,056	53%	A	1,316	66%	B	1,216	61%	B	1290	65%	B	1,753	88%	D	1582	79%	C
	W 1 st St	E/O	N Pine St	2	2,000	1,186	59%	A	1,357	68%	B	1,294	65%	B	1,357	68%	B	1,661	83%	D	1,552	78%	C
	N Pennsylvania Ave	N/O	SR 903	2	2,000	199	10%	A	230	12%	A	217	11%	A	228	11%	A	283	14%	A	283	14%	A
	N Oakes Ave	N/O	Railroad Ave	2	2,000	730	37%	A	837	42%	A	800	40%	A	817	41%	A	1,007	50%	A	1007	50%	A
	Bullfrog Road	S/O	SR 903	2	2,000	936	47%	A	1,018	51%	A	1,017	51%	A	1,191	60%	A	1,343	67%	B	1,343	67%	B

1. The City of Cle Elum’s major collector idealized capacities are 1,000 vph/ln, with 400 vph for two-way left-turn (TWLT) lanes.
2. LOS = Level of Service. Bold indicates does not meet LOS standard. (LOS A = 0.60 V/C, LOS B = 0.61 to 0.70 V/C, LOS C = 0.71 to 0.80 V/C, LOS D = 0.81 to 0.90 V/C, LOS E = 0.91 to 1.0 V/C, LOS F = >1.0 V/C).

Table 3.6-11
ROADWAY LOS SUMMARY (CITY OF CLE ELUM COMPREHENSIVE PLAN) – FRIDAY PM PEAK HOUR

						2032 Friday									2037 Friday								
						'Baseline'			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B			'Baseline'			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B		
Functional Class	Road Name	Direction of (E/O, W/O, S/O, N/O)	Nearest Crossroad	Number of Lanes	Idealized Roadway Capacity (vph) ¹	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²
Freeways	I-90 Eastbound Off-ramp (Exit 84)	to	W 1 st Street	1	1,200	538	45%	A	549	46%	A	537	45%	A	605	50%	A	624	52%	A	624	52%	A
	I-90 Westbound On-ramp (Exit 84)	from	W 1 st Street	1	1,200	347	29%	A	358	30%	A	352	29%	A	390	33%	A	409	34%	A	409	34%	A
	I-90 Westbound Off-ramp (Exit 84A)	to	N Oakes Ave	1	1,200	189	16%	A	249	21%	A	237	20%	A	216	18%	A	324	27%	A	324	27%	A
	I-90 Eastbound On-ramp (Exit 84A)	from	N Oakes Ave	1	1,200	259	22%	A	306	26%	A	281	23%	A	290	24%	A	372	31%	A	372	31%	A
	I-90 Eastbound On-ramp (Exit 80)	from	Bullfrog Road	1	1,200	142	12%	A	172	14%	A	156	13%	A	177	15%	A	232	19%	A	232	19%	A
	I-90 Westbound Off-ramp (Exit 80)	to	Bullfrog Road	1	1,200	148	12%	A	198	17%	A	188	16%	A	191	16%	A	278	23%	A	278	23%	A
Major Collector	SR 903 (W 1 st St) (Eastbound Only)	W/O	N Pennsylvania Ave	1	1,000	570	57%	A	636	64%	B	601	60%	A	642	64%	B	760	76%	C	760	76%	C
	SR 903 (W 2 nd St)	W/O	N Oakes Ave	2	2,000	803	40%	A	993	50%	A	918	46%	A	1,009	50%	A	1,345	67%	B	1,345	67%	B
	SR 903	W/O	N Stafford Ave/ S Cle Elum Way	2	2,000	903	45%	A	1,163	58%	A	1,063	53%	A	1,117	56%	A	1,580	79%	C	1,580	79%	C
	W 1 st St	E/O	N Pine St	2	2,000	1,278	64%	B	1,449	72%	C	1,386	69%	B	1,448	72%	C	1,752	88%	D	1,448	72%	C
	N Pennsylvania Ave	N/O	SR 903	2	2,000	169	8%	A	200	10%	A	187	9%	A	196	10%	A	251	13%	A	251	13%	A
	N Oakes Ave	N/O	Railroad Ave	2	2,000	536	27%	A	643	32%	A	606	30%	A	604	30%	A	794	40%	A	794	40%	A
	Bullfrog Road	S/O	SR 903	2	2,000	866	43%	A	948	47%	A	947	47%	A	1,090	55%	A	1,242	62%	B	1,242	62%	B

1. The City of Cle Elum’s major collector idealized capacities are 1,000 vph/ln, with 400 vph for two-way left-turn (TWLT) lanes.
2. LOS = Level of Service. Bold indicates does not meet LOS standard. (LOS A = 0.60 V/C, LOS B = 0.61 to 0.70 V/C, LOS C = 0.71 to 0.80 V/C, LOS D = 0.81 to 0.90 V/C, LOS E = 0.91 to 1.0 V/C, LOS F = >1.0 V/C).

Table 3.6-12
ROADWAY LOS SUMMARY (CITY OF CLE ELUM COMPREHENSIVE PLAN) – SUNDAY PM PEAK HOUR

						2032 Sunday									2037 Sunday								
						'Baseline'			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B			'Baseline'			With Bullfrog Flats Project Scenario A			With Bullfrog Flats Project Scenario B		
Functional Class	Road Name	Direction of (E/O, W/O, S/O, N/O)	Nearest Crossroad	Number of Lanes	Idealized Roadway Capacity (vph) ¹	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²
Freeways	I-90 Eastbound Off-ramp (Exit 84)	to	W 1 st Street	1	1,200	421	35%	A	428	36%	A	428	36%	A	455	38%	A	470	39%	A	470	39%	A
	I-90 Westbound On-ramp (Exit 84)	from	W 1 st Street	1	1,200	382	32%	A	388	32%	A	388	32%	A	410	34%	A	421	35%	A	421	35%	A
	I-90 Westbound Off-ramp (Exit 84A)	to	N Oakes Ave	1	1,200	171	14%	A	215	18%	A	214	18%	A	189	16%	A	274	23%	A	273	23%	A
	I-90 Eastbound On-ramp (Exit 84A)	from	N Oakes Ave	1	1,200	260	22%	A	287	24%	A	287	24%	A	277	23%	A	329	27%	A	328	27%	A
	I-90 Eastbound On-ramp (Exit 80)	from	Bullfrog Road	1	1,200	111	9%	A	129	11%	A	129	11%	A	133	11%	A	167	14%	A	167	14%	A
	I-90 Westbound Off-ramp (Exit 80)	to	Bullfrog Road	1	1,200	68	6%	A	103	9%	A	103	9%	A	87	7%	A	158	13%	A	157	13%	A
Major Collector	SR 903 (W 1 st St) (Eastbound Only)	W/O	N Pennsylvania Ave	1	1,000	382	38%	A	420	42%	A	419	42%	A	411	41%	A	485	49%	A	484	48%	A
	SR 903 (W 2 nd St)	W/O	N Oakes Ave	2	2,000	606	30%	A	729	36%	A	726	36%	A	764	38%	A	998	50%	A	995	50%	A
	SR 903	W/O	N Stafford Ave/ S Cle Elum Way	2	2,000	671	34%	A	837	42%	A	835	42%	A	820	41%	A	1,143	57%	A	1,139	57%	A
	W 1 st St	E/O	N Pine St	2	2,000	988	49%	A	1,098	55%	A	1,096	55%	A	1,074	54%	A	1,289	64%	B	1,287	64%	B
	N Pennsylvania Ave	N/O	SR 903	2	2,000	122	6%	A	143	7%	A	141	7%	A	141	7%	A	178	9%	A	178	9%	A
	N Oakes Ave	N/O	Railroad Ave	2	2,000	451	23%	A	522	26%	A	521	26%	A	487	24%	A	624	31%	A	622	31%	A
	Bullfrog Road	S/O	SR 903	2	2,000	585	29%	A	671	34%	A	670	34%	A	707	35%	A	874	44%	A	873	44%	A

1. The City of Cle Elum’s major collector idealized capacities are 1,000 vph/ln, with 400 vph for two-way left-turn (TWLT) lanes.
2. LOS = Level of Service. Bold indicates does not meet LOS standard. (LOS A = 0.60 V/C, LOS B = 0.61 to 0.70 V/C, LOS C = 0.71 to 0.80 V/C, LOS D = 0.81 to 0.90 V/C, LOS E = 0.91 to 1.0 V/C, LOS F = >1.0 V/C).

Future Year Site Access LOS

Table 3.6-13 summarizes LOS at the site access intersections for the Bullfrog Flats Project in years 2032 and 2037, before implementing improvements. The LOS analyses for the site access locations assumes that all site access locations would be two-way stop-controlled with the major streets (Bullfrog Road or SR 903) free-flow. It should be noted that a site-access LOS evaluation was not completed at the Douglas Munro site access driveway (south of the site) given the driveway is expected to operate with minimal delay with minor thru-traffic on Douglas Munro.

Site access locations forecast to operate at non-compliant LOS (LOS D, E, or F) are shown in bold text in the tables. The Applicant will be responsible for 100% of the cost to construct all site access intersections.

LOS calculations are included in **Appendix D**.

Table 3.6-13
SITE ACCESS LOS SUMMARY

			Future Conditions (Summer Peak)							
			2032				2037			
			With Project (Scenario A)		With Project (Scenario B)		With Project (Scenario A)		With Project (Scenario B)	
Site Access Intersection ¹	LOS Standard	Movement	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹
WEEKDAY PM PEAK HOUR CONDITIONS										
28. Bullfrog Road / North Access	C	Westbound Approach	C	18.9	C	15.8	D	32.6	C	22.1
	C	Southbound Left-Turn	A	8.9	A	8.9	A	9.6	A	9.6
29. Bullfrog Road / Center Access	C	Westbound Approach	C	18.8	C	15.6	E	39.3	C	22.7
	C	Southbound Left-Turn	A	8.8	A	8.8	A	9.6	A	9.4
30. Bullfrog Road / South Access	C	Westbound Approach	C	16.7	C	15.9	D	27.3	C	24.0
		Southbound Left-Turn	A	8.9	A	8.9	A	9.8	A	9.6
31. SR 903 / Bala Dr / Main Access	C	Northbound Left-Turn	F	>100	F	55.4	F	>100	F	>100
	C	Southbound Approach	F	87.3	E	48.9	F	>100	F	>100
	C	Eastbound Left-Turn	A	0.0	A	0.0	A	0.0	A	0.0
	C	Westbound Left-Turn	B	10.0	A	9.7	B	12.4	B	11.5
FRIDAY PM PEAK HOUR CONDITIONS										
28. Bullfrog Road / North Access	C	Westbound Approach	C	17.8	B	14.9	D	28.5	C	19.9
	C	Southbound Left-Turn	A	8.6	A	8.6	A	9.2	A	9.1
29. Bullfrog Road / Center Access	C	Westbound Approach	C	18.4	C	15.3	E	36.1	C	21.7
	C	Southbound Left-Turn	A	8.8	A	8.7	A	9.4	A	9.3
30. Bullfrog Road / South Access	C	Westbound Approach	C	16.4	C	15.7	D	25.8	C	22.8
	C	Southbound Left-Turn	A	8.9	A	8.8	A	9.6	A	9.5
31. SR 903 / Bala Dr / Main Access	C	Northbound Left-Turn	F	77.4	E	40.0	F	>100	F	>100
	C	Southbound Approach	E	44.4	D	32.6	F	>100	F	>100
	C	Eastbound Left-Turn	A	8.7	A	8.7	A	9.1	A	9.1
	C	Westbound Left-Turn	A	9.2	A	9.0	B	10.7	B	10.1
SUNDAY PM PEAK HOUR CONDITIONS										
28. Bullfrog Road / North Access	C	Westbound Approach	B	12.1	B	12.1	B	14.4	B	14.4
	C	Southbound Left-Turn	A	7.9	A	7.9	A	8.3	A	8.3
29. Bullfrog Road / Center Access	C	Westbound Approach	B	12.5	B	12.5	C	15.7	C	15.6
	C	Southbound Left-Turn	A	8.0	A	8.0	A	8.3	A	8.3
30. Bullfrog Road / South Access	C	Westbound Approach	B	12.7	B	12.7	C	16.3	C	16.3
	C	Southbound Left-Turn	A	8.0	A	8.0	A	8.4	A	8.4
31. SR 903 / Bala Dr / Main Access	C	Northbound Left-Turn	C	23.0	C	22.7	E	44.4	E	43.1
	C	Southbound Approach	C	22.0	C	21.9	E	49.2	E	48.5
	C	Eastbound Left-Turn	A	0.0	A	0.0	A	0.0	A	0.0
	C	Westbound Left-Turn	A	8.4	A	8.4	A	9.2	A	9.1

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. LOS analysis at site access intersections assumes two-way stop control with major roadway (Bullfrog Road and SR 903) being free flow. Bold indicates does not meet LOS standard.

Mitigation Measures

This section identifies a program of measures to mitigate adverse transportation impacts of the *Bullfrog Flats Project*. Measures include payment for a proportionate share of necessary improvements and periodic monitoring. In addition, it is assumed that the Applicant would be responsible for 100% of the costs to construct all site access improvements, including those necessary to address any expected LOS deficiency at those site access points.

2024 Bullfrog Flats Proposal Mitigation

Table 3.6-14 summarizes several aspects of the Bullfrog Flats Project mitigation program:

- Mitigation measures at the 9 study intersections that are anticipated to operate at a non-compliant LOS for weekday summer PM peak hour conditions in 2032 or 2037 with the Bullfrog Flats Project. It should be noted that no mitigation is proposed at the Bullfrog Rd/Firehouse Rd intersection given the relatively low side-street volumes (less than 25 eastbound and westbound trips by 2037) and negligible project impact (less than 0.5 seconds of increased delay with the project);
- Types of potential improvements (i.e. compact roundabout, turn restrictions, etc.) to mitigate LOS impacts; and
- Calculations of potential pro-rata shares for funding the identified mitigation improvements.

The proposed mitigation measures have been identified in consultation with agencies with jurisdiction over the affected intersections (WSDOT, Kittitas County and the City of Roslyn). Additional details regarding the mitigation design, the expected costs -- including the pro-rata share cost of the mitigation, funding approach and the timing of the improvements -- will be further evaluated and discussed between and among the project Applicant, the City of Cle Elum and affected agencies including Kittitas County, WSDOT, and the City of Roslyn. Mitigation requirements will be incorporated into conditions of approval and a mitigation agreement between the project Applicant and the City of Cle Elum. Improvement needs and mitigation will also be addressed in subsequent updates to the appropriate jurisdiction's transportation plans and capital improvement programs. A figure showing the location of intersection improvements at the off-site study intersections and site access intersections is included in **Appendix D**.

The proposed mitigation measures at intersections within WSDOT's jurisdiction (i.e., SR 903 and Bullfrog Road at I-90 interchange) were coordinated with WSDOT during preliminary Intersection Control Evaluation (ICE) process. Criteria addressed in the ICE document includes LOS operations, safety, right-of-way acquisition, engineering criteria and feasibility, and context for sustainable design. Coordination is ongoing and mitigation be affected by possible changes to LOS standards in the future, or WSDOT decisions regarding mitigation.

Table 3.6-14
SUMMARY OF WEEKDAY PM PEAK HOUR MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE

Study Intersection	Potential Improvement to Mitigate Weekday PM Peak Hour LOS Deficiency ¹	Year	Bullfrog Flats Project Scenario A			Bullfrog Flats Project Scenario B			
			LOS	Background Share ³	Project Share ²	Year	LOS	Background Share ³	Project Share ²
IMPROVEMENTS NEEDED FOR ‘BASELINE’ BACKGROUND CONDITIONS									
1. Bullfrog Rd / I-90 EB Ramps ⁶	Compact Roundabout	--	--	--	--	2037	E	89.4%	10.6%
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2032	F	82.1%	17.9%	2032	F	88.1%	11.9%
9. N Pine St / W 2 nd St (SR 903)	Compact Roundabout	2032	D	80.3%	19.7%	2032	D	86.8%	13.2%
12. Pine St / W 1 st St	Compact Roundabout	2032	E	86.2%	13.8%	2032	E	90.8%	9.2%
13. N Stafford Ave / W 2 nd St (SR 903) ⁵	Compact Roundabout	2032	F	82.6%	17.4%	2032	F	88.5%	11.5%
IMPROVEMENTS NEEDED WITH BULLFROG FLATS PROJECT ⁴									
1. Bullfrog Rd / I-90 EB Ramps ⁶	Compact Roundabout	2032	D	89.3%	10.7%	--	--	--	--
3. Bullfrog Rd / Tumble Creek Dr	Refuge/merge lane on Bullfrog Rd	2037	F	78.6%	21.4%	2037	E	84.6%	15.4%
7. Denny Ave / W 2 nd St (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2032	D	80.3%	19.7%	2037	D	81.6%	18.4%
15. N Oakes Ave / W 2 nd St (SR 903)	Compact Roundabout	2032	E	83.6%	16.4%	2032	D	89.4%	10.6%
21. SR 903 / E Pennsylvania Ave	All-Way Stop	2032	D	86.1%	13.9%	2032	D	91.0%	9.0%

1. Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; LOS results with mitigation are included in Tables 22 and 23.
2. Estimated pro-rata share for Bullfrog Flats Project is preliminary and will be adjusted based on a future Monitoring Program.
3. Share of future traffic volumes associated with ‘Baseline’/background traffic growth, excluding Bullfrog Flats Project.
4. Mitigation not triggered by ‘Baseline’ conditions but triggered by traffic generated by Bullfrog Flats Project.
5. The City has plans to install a compact roundabout at intersection #13. This intersection improvement is partially funded.
6. The Bullfrog Road/I-90 EB Ramps intersection is anticipated to operate at non-compliant LOS as a result of 2032 With Project conditions for Scenario A and as a result of 2037 Baseline conditions for Scenario B.

Pro-Rata Share Methodology for Mitigation

Nine study intersections are anticipated to operate at non-compliant LOS under future weekday summer PM peak hour conditions. At this time, the City has received partial grant funding to install a compact roundabout at intersection #13 (N Stafford Ave / W 2nd Street (SR 903)), however, neither the City nor WSDOT currently have adopted plans or secured funding to improve the other non-compliant study intersections.

The Bullfrog Flats Project would contribute a pro-rata share towards these intersection improvements based on its proportional impact to the intersection relative to total traffic (including background traffic) impacting the intersection. Preliminary pro-rata share estimates, shown in **Table 3.6-14**, are calculated relative to the background traffic growth component of the total future forecast weekday summer PM peak hour traffic volumes. The calculation divides the total weekday PM peak hour project traffic associated with the Bullfrog Flats Project by the total forecast future with-project weekday PM peak hour traffic volumes ('Baseline' plus *Bullfrog Flats Project* traffic). This is the same methodology used for "Scenario B" in the transportation analyses in the 2021 SEIS and the 2023 Addendum. The detailed pro-rata share calculations are included in **Appendix D**.

Future Year Conditions with Mitigation

Intersection LOS were evaluated with construction of the identified mitigating improvements to determine their effectiveness. **Tables 3.6-15** and **3.6-16** summarize LOS for weekday, Friday, and Sunday summer PM peak hour conditions in 2037 under land use Scenarios A and B, respectively. Detailed LOS calculations are included in **Appendix D**.

As shown in the tables, the potential intersection improvements are expected to improve conditions to compliant levels of service during the weekday, Friday, and Sunday summer PM peak hours with the exception of #21 – Pennsylvania Ave / 1st Street (SR 903): as an all-way stop-controlled intersection, the intersection is anticipated to operate at LOS D in 2037 during the Friday summer PM peak hour with the *Bullfrog Flats Project* (Scenario A).

Table 3.6-15
FUTURE YEAR INTERSECTION LOS SUMMARY WITH MITIGATION AND SITE ACCESS IMPROVEMENTS FOR BULLFROG FLATS PROJECT (SCENARIO A)

Location	Potential Improvement to Mitigate Weekday LOS Deficiency ¹	Weekday PM Peak Hour				Friday PM Peak Hour				Sunday PM Peak Hour			
		Mitigation Trigger		2037 With Mitigation		Mitigation Trigger		2037 With Mitigation		Mitigation Trigger		2037 With Mitigation	
		Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²
Off-Site Study Intersection:													
#1 – Bullfrog Road / I-90 EB Ramps	Compact Roundabout Refuge/merge lane on Bullfrog Rd	2032	Project	B	10.0	2037	Project	B	10.1	NO MITIGATION NEEDED			
#3 – Bullfrog Road / Tumble Creek Dr		2037	Project	C	22.5	2037	Project	C	20.0	NO MITIGATION NEEDED			
#7 – Denny Ave / W 2 nd Street (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2032	Project	C	16.8	2032	Project	C	17.5	NO MITIGATION NEEDED			
#8 – Ranger Sta Rd / Miller Ave / W 2 nd St (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2032	Baseline	C	24.2	2032	Baseline	C	19.1	2032	Project	B	13.9
#9 – N Pine Street / W 2 nd Street (SR 903)	Compact Roundabout	2032	Baseline	A	8.9	2032	Baseline	A	9.3	2037	Project	A	6.1
#12 – N Pine St / W 1 st Street	Compact Roundabout	2032	Baseline	A	9.4	2032	Baseline	B	10.7	2032	Baseline	A	6.5
#13 – N Stafford Ave / W 2 nd Street (SR 903)	Compact Roundabout ³	2032	Baseline	A	5.6	2032	Baseline	A	4.9	2032	Project	A	3.5
#15 – N Oakes Ave / W 2 nd Street (SR 903)	Compact Roundabout	2032	Project	A	3.2	2032	Project	A	3.2	2037	Project	A	2.8
#21 – Pennsylvania Ave / 1 st Street (SR 903)	All-Way Stop	2032	Project	C	21.2	2032	Baseline	D	31.5	2037	Project	B	14.7
Site Access:													
#28 - Bullfrog Road / North Access ⁴	Mitigated with #29	2032	Project	C	21.0	2032	Project	C	18.9	2032	Project	B	11.9
#29 - Bullfrog Road / Center Access ⁴	Compact Roundabout	2032	Project	A	8.4	2032	Project	A	8.1	2032	Project	A	5.7
#30 - Bullfrog Road / South Access ⁴	Mitigated with #29	2032	Project	C	23.4	2032	Project	C	22.4	2032	Project	B	15.0
#31 - SR 903 / Bala Dr / Main Access	Compact Roundabout	2032	Project	B	13.4	2032	Project	A	8.1	2032	Project	A	5.9

1. Improvement needed to mitigate non-compliant LOS during weekday PM peak hour.
2. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.
3. The City has plans to install a compact roundabout at intersection #13. This intersection improvement is partially funded.
4. Traffic volumes account for a minor shift in traffic from the secondary North and South Access intersections to the main Center Access intersection on Bullfrog Road.

Table 3.6-16
FUTURE YEAR INTERSECTION LOS SUMMARY WITH MITIGATION AND SITE ACCESS IMPROVEMENTS FOR BULLFROG FLATS PROJECT (SCENARIO B)

Location	Potential Improvement to Mitigate Weekday LOS Deficiency ¹	Weekday PM Peak Hour				Friday PM Peak Hour				Sunday PM Peak Hour			
		Mitigation Trigger		2037 With Mitigation		Mitigation Trigger		2037 With Mitigation		Mitigation Trigger		2037 With Mitigation	
		Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²
Off-Site Study Intersection:													
#1 – Bullfrog Road / I-90 EB Ramps	Compact Roundabout Refuge/merge lane on Bullfrog Rd	2037	Baseline	A	9.9	2037	Project	B	10.0	NO MITIGATION NEEDED			
#3 – Bullfrog Road / Tumble Creek Dr		2037	Project	C	20.4	2037	Project	C	18.4	NO MITIGATION NEEDED			
#7 – Denny Ave / W 2 nd Street (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2037	Project	C	16.0	2037	Baseline	C	16.6	NO MITIGATION NEEDED			
#8 – Ranger Sta Rd / Miller Ave / W 2 nd St (SR 903)	Restrict Northbound Left/ Southbound-Left Turns	2032	Baseline	C	19.8	2032	Baseline	C	16.4	2032	Project	B	13.8
#9 – N Pine Street / W 2 nd Street (SR 903)	Compact Roundabout	2032	Baseline	A	7.7	2032	Baseline	A	8.4	2037	Project	A	6.1
#12 – N Pine St / W 1 st Street	Compact Roundabout	2032	Baseline	A	8.0	2032	Baseline	A	8.7	2032	Baseline	A	6.5
#13 – N Stafford Ave / W 2 nd Street (SR 903)	Compact Roundabout ³	2032	Baseline	A	4.6	2032	Baseline	A	4.4	2032	Project	A	3.5
#15 – N Oakes Ave / W 2 nd Street (SR 903)	Compact Roundabout	2032	Project	A	3.1	2037	Baseline	A	3.0	2037	Project	A	2.8
#21 – Pennsylvania Ave / 1 st Street (SR 903)	All-Way Stop	2032	Project	C	16.7	2032	Baseline	C	22.0	2037	Project	B	14.6
Site Access:													
#28 - Bullfrog Road / North Access ⁴	Mitigated with #29	2032	Project	C	15.5	2032	Project	C	15.7	2032	Project	B	11.9
#29 - Bullfrog Road / Center Access ⁴	Compact Roundabout	2032	Project	A	7.6	2032	Project	A	7.4	2032	Project	A	5.7
#30 - Bullfrog Road / South Access ⁴	Mitigated with #29	2032	Project	C	21.2	2032	Project	C	20.3	2032	Project	B	14.9
#31 - SR 903 / Bala Dr / Main Access ⁴	Compact Roundabout	2032	Project	A	8.3	2032	Project	A	6.3	2032	Project	A	5.8

1. Improvement needed to mitigate non-compliant LOS during weekday PM peak hour.
2. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.
3. The City has plans to install a compact roundabout at intersection #13. This intersection improvement is partially funded.
4. Traffic volumes account for a minor shift in traffic from the secondary North and South Access intersections to the main Center Access intersection on Bullfrog Road.

Site Access Intersections and Roadway Improvements

The *Bullfrog Flats Project* will construct new on-site roadways and intersections at its three access points onto Bullfrog Road, its single access onto SR 903, and its single access onto Douglas Munro Blvd. All on-site roads will be public and constructed to City of Cle Elum standards. The City will also ensure that design of the new on-site roadways meets minimum requirements for emergency vehicle access and school bus access.

The proposed traffic control at the new *Bullfrog Flats Project* site access points on Bullfrog Road and SR 903 are as follows:

- **#28 – Bullfrog Road / North Access** A new compact roundabout is proposed at the Bullfrog Road / Center Access, which is expected operate at LOS A in 2037 under Scenario A of the *Bullfrog Flats Project*. With excess capacity at the main access intersection on Bullfrog Road, there is anticipated to be a shift in traffic away from the secondary North and South Access intersections to the main Center Access roundabout. For example, vehicles destined to the south on Bullfrog Road may choose to exit the site via the roundabout instead of using the stop-controlled North and South Access intersections that have higher delays. Therefore, no additional improvements are proposed at this site access intersection.
- **#29 – Bullfrog Road / Center Access.** With Applicant construction of a compact (single-lane) roundabout at this Center Access location under both scenarios of the *Bullfrog Flats Project*, all site access intersections along Bullfrog Road are expected to operate at compliant LOS.
- **#30 – Bullfrog Road / South.** A new compact roundabout is proposed at the Bullfrog Road / Center Access, which is expected to operate at LOS A in 2037 under Scenario A of the *Bullfrog Flats Project*. With There would be excess capacity at the main access intersection on Bullfrog Road, which would result a shift in traffic away from the secondary North and South Access intersections to the main Center Access roundabout.
- **#31 - SR 903 / Bala Drive / Main Access.** With construction of a compact (single-lane) roundabout at this site access location under both scenarios of the *Bullfrog Flats Project*, this intersection is expected to operate at compliant LOS.
- **Douglas Munro Blvd Access.** A level of service analysis was not conducted at the Douglas Munro site access driveway because the driveway is expected to operate with minimal delay with minor thru-traffic on Douglas Munro Blvd. Two-way stop control (with Douglas Munro free flow) is recommended for access control at this site access intersection.

Additional Mitigation Measures

Traffic Monitoring Program

The 2002 Development Agreement and Conditions of Approval included an ongoing obligation for traffic monitoring to confirm expected impacts, timing, and mitigation measures. Depending on the timing and content of applications for future phases of development of the *Bullfrog Flats Project*, beyond the first three preliminary plats that are the subject of the current pending application, traffic monitoring may be warranted. Any future traffic monitoring program, if required, would likely be similar in format and function to the established program documented in the 2002 Bullfrog Flats Condition of Approval No. 92. The City would coordinate the monitoring program with Kittitas County and WSDOT. The traffic monitoring program would have the following objectives:

- A. Document traffic volumes at key locations (roadways and/or intersections) that would be impacted by traffic generated by the *Bullfrog Flats Project*.
- B. Separate traffic volumes at key locations by background traffic and *Bullfrog Flats Project* traffic.
- C. Establish the methodology by which to determine the timing and pro-rata share financial contributions for implementing transportation improvements required for mitigation.

The specific details of the traffic monitoring program will be established in conditions of approval for the pending applications and will address the following: circumstances under which additional traffic monitoring is warranted; the number of phases of monitoring; appropriate timing of phases of monitoring (i.e., at defined development years or relative to percent or number of units constructed); time periods to be counted; key locations to be counted; and reporting requirements.

Construction Management Plan

To minimize construction traffic impacts, the *Bullfrog Flats Project* should prepare a Construction Management Plan prior to beginning construction. Truck routes and haul route agreements for construction-related traffic should be established in coordination with the City of Cle Elum, Kittitas County, and WSDOT, as necessary. Additionally, provisions should be made in conditions of approval for restoration of road surfaces damaged by construction traffic, if any.

Trail System and Sidewalks

The *Bullfrog Flats Project* would provide an approximately 6-mile network of trails and sidewalks throughout the site, including: hike/bike, equestrian, and golf cart paths. These trails would generally be located around the periphery of the proposed development, and would connect to on-site development, as well as to existing off-site trails in Suncadia to the north, the Coal Mines Trail to the northeast, and the Washington State Horse Park to the south). Sidewalks would also be provided along one side of the on-site road connecting SR 903 and Bullfrog Road for non-motorized circulation.

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Proposed development of 2024 *Bullfrog Flats Proposal* would increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR 903, SR 970, and I-90). This is an unavoidable impact of urban development and has been anticipated and evaluated in prior environmental documents and project approvals.

The LOS analyses indicates that several of the studied intersections would exceed adopted LOS standards during the summer PM peak hours in the future analysis years with the additional traffic generated by the *Bullfrog Flats Project*; many of these intersections would also exceed the LOS standards without the *Bullfrog Flats Project* due to continued growth in background traffic, including vested projects. The improvements listed above in **Table 3.6-14** are expected to mitigate significant adverse impacts from the *Bullfrog Flats Project* by bringing the intersections to compliant levels of service during the weekday summer PM peak hour. The specific improvements and the *Bullfrog Flats Project* proportionate share of the required improvements will be included in updated conditions of approval.

Section 3.7

PUBLIC SERVICES

Prior Environmental Analysis

The 2002 UGA FEIS described the existing conditions for public services -- including police, fire protection, hospital and emergency medical, emergency dispatch (911), and schools -- serving the Bullfrog Flats site. Current conditions were provided for each service purveyor, including incident history and level of service (see 2002 UGA FEIS Section 3.15). The 2021 SEIS and 2023 SEIS Addendum includes updates to existing conditions for the Cle Elum-Roslyn-South Cle Elum Police Department, City of Cle Elum Fire Department, Kittitas County Hospital District No. 1, Kittitas County Hospital District No. 2, KITTCOM (emergency dispatch service), and the Cle Elum-Roslyn School District (see 2021 SEIS Section 3.12 and 2023 SEIS Addendum Section 3.7 for details). Conditions have not changed significantly since the prior analysis.

Because most public service purveyors have not formally adopted levels of service (LOS), the recent environmental documents for proposals on the UGA site have derived de facto levels of service by using existing agency staffing and the population served to construct a ratio of staff per 1,000 to population to express a level of service and to estimate public services impacts/demand. However, where a metric was provided by a service purveyor district, (e.g., Cle Elum-Roslyn School District student generation rates), it was used to estimate demand. Fire service demand was estimated based on a survey of staffing-to-population ratios in small and medium sized cities in central and eastern Washington. Police service demand was estimated using both a ratio of officers to population and the results of a computer model used by the Cle Elum Police Department (ICMA model). As noted in **Section 3.3** (Population, Housing, and Employment), the 2002 UGA FEIS assumed a population of approximately 2,945 people for Alternative 5, based on projected household size and number of housing units. **Table 3.7-1** provides a summary of LOS impacts that were identified in 2002 for UGA FEIS Alternative 5 development agreement conditions of approval and subsequent environmental documents.

Table 3.7-1
BULLFROG FLATS PUBLIC SERVICES LOS & IMPACT COMPARISON SUMMARY

	LOS per DA/Conditions of Approval	Staffing Levels/De Facto LOS (2021 SEIS and 2023 Addendum) - Buildout Demand ¹	2024 Bullfrog Flats Proposal ¹
Police Service	2 per 1,000 population/6.7 officers	3 per 1,000 population = 8.9 officers ICMA model = 9 or 12 officers at buildout	7.6 officers
	- Equipment + vehicles - Schedule for hiring new officers <u>Note</u>: need for admin support and station expansion identified in 2002 EIS but not required as condition of approval.	<i>Equipment, admin staff, and some improvements to station to house added staff.</i>	<i>Equipment, admin staff, and some improvements to station to house added staff.</i>
Fire Service	6 trained volunteer firefighters or 3 FTE firefighters	1.8 FTE firefighters	1.6 FTE firefighters
	½ funding for chief \$20k towards rescue vehicle - Share of fire tender \$ to repay \$600k in general obligation bonds to remodel fire station	LOS= .66/1,000	LOS = .66 per 1,000
School District	Mitigation agreement executed ²	376 students, 25.4 teachers, 6.3 - 8.4 buses ³	376 students, 25.4 teachers, 6.3 – 8.4 buses ³
	School site dedication Payments for portables, school buses, and some admin costs		
Hospital District 2	Mitigation agreement executed ²	7.3 paramedics, 6.0 EMTs (buildout)	6.6 paramedics, 5.4 EMTs
	Monitor costs, payments		
KITTCOMM	Mitigation TBD per fiscal monitoring	.3/1,000 = 0.9 dispatchers	0.8 dispatchers
	1 dispatcher		
KVH/Hosp Dist. 1	Not evaluated; No mitigation identified	1.0 physicians, 0.2 APCs, 6.0 RNs	0.9 physicians, 0.2 APCs, 5.5 RNs

1. Calculations based on current de facto LOS as established in the 2021 SEIS and 2023 Addendum, including LOS established in the 2021 SEIS for Fire Departments based on average staffing levels for representative departments in central and eastern Washington.

2. Mitigation agreements were executed, attached to the Development Agreement and were subsequently satisfied.

3. The per unit student generation metric for the School District has increased since 2002 (currently 0.4 for SF and 0.1 per MF) and results in 376 students, compared to 914 in the 2002 FEIS (which appears to be a typo in the 2002 EIS).

EIS Addendum - 2024 Bullfrog Flats Proposal

The 2024 Bullfrog Flats Proposal includes the same amount of housing units (1,334 total housing units) and split of single family and multi-family residences that was analyzed for Alternative 5 in the prior SEPA documents. As noted in **Section 3.3**, Population, Housing, and Employment, based on recent household size population estimates (1.9 persons per household [OFM, 2024]) and conservatively assuming 100% occupancy of proposed residential units, the 2024 Bullfrog Flats Proposal would generate a population of approximately 2,535 people, which is 14 percent less than identified in the 2002 FEIS. Assuming the same levels of service, public service demand would be incrementally lower based on reduced population/ household size estimates. Overall, impacts to public services from the 2024 Bullfrog Flats Proposal would be similar to or incrementally less than the impacts identified in the prior environmental documents. No new or different significant adverse impacts to public services would occur.

Mitigation measures identified in the 2002 FEIS and the Development Agreement included execution of mitigation agreements between Trendwest and the Hospital District and School District. Mitigation for impacts to Hospital District No. 2 were satisfied and documented in city and county resolutions adopted in 2007 (see Cle Elum Resolution 2007-15). Mitigation required for impacts to the School District was satisfied by payments for portables and buses (\$2 million), donation of a 36-acre school site, and the occurrence of a metric tied to assessed value and tax generation of the Suncadia & UGA properties combined. Refer to **Section 3.9**, Fiscal Conditions, for further details on fiscal impacts and mitigation measures.

Section 3.8

UTILITIES

Prior Environmental Analysis

Stormwater

The Bullfrog Flats UGA stormwater management system relied on infiltration where feasible based on soil conditions and a combination of basis and enhanced treatment consistent with the requirements of the 2001 Ecology Stormwater Management Manual. The 2002 UGA FEIS analysis of Alternative 5 divided the Bullfrog Flats site in four water quality management zones – A, B, C, and D – based on the types and character of on-site soils, depth to groundwater, discharges to ground or tributaries to fish-bearing waters, the level of required treatment and similar considerations and requirements identified in the 2001 Ecology Manual. Development Agreement Condition of Approval No. 50 required preparation and submittal of a Master Drainage Plan for the entire project site. Condition of Approval No. 110 of the Development Agreement states that the developer or individual parcel developer is responsible for all costs to construct all water, sewer, and stormwater facilities on site, and these utilities will be constructed consistent with the Development Agreement Conditions of Approval.

Sanitary Sewer

The proposed site is in the City of Cle Elum's sewer service area, and the 2002 UGA FEIS assumed that wastewater from Alternative 5 would be routed to a new regional wastewater treatment plant that the City of Elum planned to construct (and has since constructed). An existing sewer trunk system network traverses the site. This existing system consists of a 21-in. diameter sewer main that follows Douglas Munro Boulevard (Ranger Station Road) and then splits into an 18-in. diameter sewer main to the west and a 15-in. diameter sewer main to the north, and these will be utilized by the project. The sanitary sewer system to serve Alternative 5 would be managed by the City of Cle Elum and would be gravity fed to existing sewer mains adjacent and through to the site. No lift stations were proposed as part of the development. Wastewater Treatment Plant capacity was specifically reserved for the UGA project.

Development Agreement Condition of Approval No. 97 states that operation and maintenance costs associated with water and sewer utilities are or will be covered under separate agreements.

Potable Water

The 2002 UGA FEIS analyzed estimated water demand from buildout of Alternative 5 and anticipated that the regional water treatment plant would provide operational water supply for the Bullfrog Flats UGA, and that the project would comply with City policies and regulations relating to the provision of water supply. At buildout under Alternative 5,

average annual treated water demand was estimated at approximately 0.48 mgd., and maximum monthly average daily demand would be approximately 0.69 mgd. Updated analysis in the 2023 SEIS Addendum identified that improvements to the City's water system are required to serve the project site. Although the City's water system has sufficient supply (see the discussion of water rights in the 2023 SEIS Addendum Section 3.8 for details), it would require improvements to meet projected demand including new filtration in the Water Treatment Plant, new Zone 3 finished water pump, and new Zone 3 reservoir storage.

Solid Waste

The 2002 UGA FEIS also analyzed solid waste generation associated with the buildout of the Bullfrog Flats UGA. Approximately 3,695 tons of solid waste per year would be generated at full buildout of Alternative 5. The 2002 UGA FEIS concluded that the projected 3,695 tons of solid waste generated per year would require an expansion of the Cle Elum Transfer Station. Subsequently, New Suncadia (Trendwest's successor) financed improvements to the solid waste transfer station.

Updated analysis in the 2023 SEIS Addendum concluded that the Bullfrog Flats UGA would generate approximately 2,900 tons of solid waste per year over the 30-year buildout period. Condition of Approval No. 114 of the Development Agreement required the applicant to contribute its pro-rata share to the costs to construct improvements to the solid waste transfer station. This condition was satisfied by New Suncadia's payment. The condition also requires the applicant to handle all construction debris, separate re-cyclable materials, and otherwise handle all its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas County SWMP.

EIS Addendum - 2024 Bullfrog Flats Proposal

Stormwater

The 2024 Bullfrog Flats Proposal includes a Preliminary Master Drainage Plan (MDP), prepared in accordance with the current Ecology 2024 Stormwater Management Manual for Eastern Washington (2024 SWMMEW). Drainage plans were also submitted for the preliminary plats. The 2024 Bullfrog Flats Project would utilize bioretention areas for runoff treatment and will provide flow control using infiltration ponds. This design is consistent with Ecology requirements and consistent with the 2002 UGA FEIS and other supplemental SEPA documentation for the site. A Sanitary Sewer and Stormwater Analysis of the 2024 Bullfrog Flats Project application by HLA Engineering and Land Surveying, Inc. is included in **Appendix E**. The City of Cle Elum's 2024 Construction Standards require all stormwater runoff occurring on all new lots and developments to be retained and dispersed onsite, no matter the impervious coverage. The 2024 Proposal includes a minor modification request to increase single family impervious lot coverage from 55% to 70%. However, consistent with the Construction Standards, stormwater collection, treatment, and disposal are all proposed onsite and no offsite stormwater improvements are anticipated to be necessary. Based on the conclusions in the updated HLA analysis (**Appendix E**), changes to the project are minor, no

significant new or different impacts to stormwater would occur, and no additional mitigation measures would be necessary.

Sanitary Sewer

The WWTP was designed to treat the flows from communities neighboring the City of Cle Elum and an agreement was entered into in 2002 between the City of Cle Elum, Town of South Cle Elum, City of Roslyn, and Trendwest investments (former owner of Suncadia and Bullfrog Flats). The Trendwest allocation of the WWTP was distributed between the UGA properties (Bullfrog Flats) and the MPR properties. According to the Sanitary System Analysis prepared by HLA Engineering and Land Surveying Inc. (see **Appendix E**), the service allocation for the UGA/Bullfrog Flats site is 14.813% of the WWTP capacity or 0.533 mgd and was reallocated to the City of Cle Elum upon annexation in 2006. In 2005, the City completed upgrades and expansion of the Upper Kittitas County Regional Wastewater Treatment Plant (WWTP), which increased its rating to a maximum month flow of 3.6 million gallons per day (mgd). Per the Bullfrog Flats Project – Water System Analysis prepared by HLA, dated December 9, 2024, the projected water demand associated with non-irrigation uses is equal to 0.319 mgd, which is less than the WWTP capacity allocated to the UGA. Wastewater treatment needs for the Bullfrog Flats Project are consistent with those originally considered and incorporated into the WWTP, and no offsite sanitary sewer improvements are necessary application. No new or different impacts to sewer service impacts would occur and no additional mitigation measures would be necessary.

Potable Water

Potable water will be supplied to the 2024 Bullfrog Flats Proposal from the City's water system. Sufficient water rights will be acquired by the applicant to supply water for proposed development of the site. Water rights for the water supplied to the site will be transferred to the City, in compliance with the requirements of the Development Agreement and its Conditions of Approval, in conjunction with phased development. Suncadia previously paid for water supply system infrastructure for service to the Blue Fern development. The majority of the project site is located within Cle Elum's water pressure zone 3. Some additional improvements (treatment plant filter train, and expanded pumping and storage facilities) will be required to reflect updated Department of Health (DOH) standards, and to meet cumulative demand from Suncadia, Bullfrog Flats, the City Heights master plan, approved by the City in 2010 and also located within pressure zone 3 and other development in pressure zone 3. HLA's water memo (**Appendix E**), reflects the new DOH requirements that will modify the long-term City's Water System Plan.

The 2024 Bullfrog Flats Proposal includes the same quantities and types of housing units as the approved 2002 UGA project, would generate similar demand for potable water, and sufficient water supply is available. Overall, no significant changes to the project have been identified and no significant new or different impacts to water service would occur. The additional system improvements identified above will be addressed in a water supply system agreement between the City and Bullfrog Flats and incorporated in a condition of approval.

The agreement will specify the necessary water system improvements, the timing/triggers for constructing the improvements, and Bullfrog Flat's pro rata share of the cost of improvements.

Solid Waste

As noted above, Condition of Approval No. 114 of the Development Agreement stated that the applicant shall contribute its pro-rata share to the costs to construct improvements to the solid waste transfer station. Pursuant to a 2001 mitigation agreement with Kittitas County Solid Waste, Trendwest provided funding to Kittitas County to support the expansion of the Cle Elum Transfer Station and to mitigate the combined proportional impacts of the MPR and UGA projects on solid waste service. Bullfrog Flats would also handle all construction debris, separate recyclable materials, and otherwise handle all its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas County Solid Waste Management Plan (SWMP). Given that the 2024 Proposal includes the same quantities and mix of housing units as required in the Development Agreement conditions of approval, it is anticipated that the Bullfrog Flats Project would generate the same or similar approximate quantities of solid waste, that no new or different impacts to solid waste service would occur, and that no additional mitigation would be necessary.

Section 3.9

FISCAL CONDITIONS

Purpose and Approach of Fiscal Study

This section provides a summary of an updated fiscal impact study conducted for the 2024 Bullfrog Flats Proposal. The full study is contained in **Appendix F**. The evaluation considers fiscal impacts to the City of Cle Elum, Kittitas County Hospital District No. 2, Cle Elum – Roslyn School District, and Kittitas County 9-1-1. It builds on the fiscal analyses in prior SEPA documents and provides a current look at the projected fiscal impacts of Bullfrog Flats based on updated assumptions about service providers, levels of service, tax rates and development values.

The fiscal impact analysis evaluates the net fiscal effects of the Bullfrog Flats Project by comparing the additional revenues it is expected to generate in the future with the additional operational costs required to support the development. Study methodology is explained fully in **Appendix F**, which also discusses some complexities relating to the allocation of revenues to different funds within the City’s accounting system (restricted or unrestricted), and issues relating to the timing of revenues and costs relative to service demands. The analysis estimates the present value of both the total costs of service increases and the total revenues available to the city and other service providers.

The evaluation relies on a cash flow revenue model that incorporates assumptions about revenues, costs, and the phasing and timing of development. These assumptions, which are critical to estimating changes in affected taxes, are based on the development program submitted by Bullfrog Flats, as reflected in the rendered site plan and master plat, and in the development timing assumptions identified in **Table 3.9-1** below.

It should also be noted that the analysis is focused on costs associated primarily with staffing needs (salary and benefits) for the provision of service and does not typically quantify capital needs such as service vehicles, equipment or building and facility improvements. These needs are generally identified, however, in the *Public Services* discussions of this and related environmental documents. There are questions, however, whether such needs are specifically caused by the Proposal or are in response to general city-wide demand and growth, and/or how to determine Bullfrog Flat’s proportional share of capital needs. The monitoring and shortfall mitigation program recommended in this would revisit these questions.

Table 3.9-1
Project Land Development Program by Type, Scale, and Timing

Product Type	First Sale Year	Units	Years of Absorption
Townhome	2027	48	3
Townhome	2028	48	3
Townhome	2029	48	3
Townhome	2030	20	3
Apartment	2029	150	1
Single Family	2027	36	4
Single Family	2028	36	4
Single Family	2029	36	4
Single Family	2030	30	4
Single Family	2027	48	2
Single Family	2028	47	2
Townhome	2028	48	4
Townhome	2029	48	4
Townhome	2029	48	4
Townhome	2030	48	4
Townhome	2031	18	4
Single Family	2028	36	3
Single Family	2029	36	3
Single Family	2029	36	3
Single Family	2030	10	3
Single Family	2028	48	3
Single Family	2029	48	3
Single Family	2029	48	3
Single Family	2030	5	3
Single Family	2030	40	3
Single Family	2031	40	3
Single Family	2032	43	3
Single Family	2030	40	5
Single Family	2031	40	5
Single Family	2032	40	5
Single Family	2033	40	5
Single Family	2034	27	5
Total		1,334	

Source: Bullfrog Flats, November 2024.

Development Program

Proposed residential development includes 1,334 residential units (single family, townhomes and apartments), which are assumed to be complete by approximately 2037. The 2002 approval also authorizes the development of 950,000 square feet of business park over approximately 30 years. The current application does not contain specific plans regarding the timing or absorption of business park space. For purposes of analysis, the fiscal study evaluates two scenarios for business park development by 2037

Scenario 1: Bullfrog Flats Project with One-Half of the Business Park

This scenario considers the Bullfrog Flats Proposal with 450,000 of business park by residential buildout in 2037. (This amount of development is consistent with the 2002 UGA project assumption that business park buildout would occur over 30 years.) The balance of the business park is assumed to develop after the end of the analysis period (by approximately 2054), and is not included in this analysis.

Business park construction is assumed to occur in three phases:

- Phase 1 (2026 start): 70,000 square feet of building space.
- Phase 2 (2030 start): an additional 175,000 square feet.
- Phase 3 (2036 start): 205,000 square feet.

Scenario 2: Residential Proposal/No Business Park

This alternative is a sensitivity analysis that focuses on the project's residential and excludes the business park. Costs in this scenario are limited to those directly associated with housing and public park & recreation facilities, and provides a more conservative estimate of the city's fiscal obligations. It also helps to isolate the relative contribution of the business park to overall project costs and revenues.

Valuation Assumptions

Table 3.9-2 below summarizes the major valuation assumptions used to derive new construction, assessed value, and taxable retail sales tax basis. Anticipated market values were provided by Bullfrog Flats and are inclusive of land preparation and infrastructure investment.

Table 3.9-2
Valuation Assumptions for Major Tax Bases

Residential	Taxable Construction Value (unit)	Market Value (weighted value/unit)	Taxable Retail Sales (unit)	Commercial	Taxable Construction Value (unit)	Market Value (sf)	Taxable Retail Sales (sf)
Single Family	\$425,200	\$607,400	\$2,500	Business Park	\$217	\$310	\$2
Multifamily	\$245,000	\$350,000	\$1,500				
Townhomes	\$283,600	\$405,200	\$2,000				

Refer to the Fiscal Conditions Report (**Appendix F**) for a more detailed discussion of the assumptions used in the analysis to estimate Bullfrog Flats construction values, market values, sales prices and taxable retail sales.

Other Updated Assumptions

The methodology used in the updated analysis is consistent with the prior studies; however, several assumptions have been updated and are described below.

Time Frame

The base year of the updated analysis incorporates information collected in 2024. The time horizon of the analysis shows impacts through 2040. The end date of 2040 is selected since this reflects a couple of years of stabilization after the final residential units are delivered in 2037 per the development program provided by Bullfrog Flats.

Population and Employment

This analysis uses a household size assumption of 1.9 persons per household for all new housing units built and occupied, based on 2024 OFM data. Refer to the discussion of household size in Section 3.3 Population, Housing and Employment of this Addendum. Using this updated figure and assuming 90% occupancy of the approved 1,334 units the buildout population is projected to be 2,281 persons. (Note that 90% is a commonly used figure for fiscal analysis. A 100% occupancy rate is often used to estimate demand for public services and transportation analyses.)

Additionally, the analysis assumes one employee per 500 square feet of built business park space, aligning with industry planning standards for employment density. This assumption provides a consistent basis for estimating workforce impacts associated with the business park development. This results in a buildout employment base of 900 employees working on a typical day if the buildings are fully occupied; the analysis applies a vacancy rate, however, to be conservative.

Tax Policy

Tax policy and applicable rates were updated for all the affected jurisdictions. This update included the following meaningful information:

- City of Cle Elum
 - The property tax rate and levy calculations were updated with 2023 valuations for 2024 taxes.
 - The revenue sharing with Kittitas County for the public safety sales tax was added.
 - Business license fees were added
 - The second 0.25% of the real estate excise taxes was adopted by the city

- Kittitas Hospital District #2
 - The property tax rate and levy calculations were updated with 2023 valuations for 2024 taxes.
 - Updates to clarify the EMS and
- Cle Elum-Roslyn School District
 - The property tax rate and levy calculations were updated to focus on the calculation methods for the enrichment levy (enrichment levies were formerly known as Maintenance and Operations levies and were the main source of funding recurring education expense, such as teachers) because of the state McCleary decision.
- KITTCOM
 - In April of 2024, voters in Kittitas County approved a proposed sales and use tax increase. KITTCOM officials stated that the sales tax increase was necessary to address outdated and unreliable emergency radio systems and communications infrastructure. This analysis provides an estimate of sales tax contributions from the project.

Public Service Costs

The fiscal analysis includes updated level-of-service standards for City of Cle Elum police and fire departments and employee compensation estimates. Staff needs are incurred in the analysis on a prorated basis depending on the amount of population in any given year depending on buildout.

The Bullfrog Flats Project proposal assumes, consistent with the 2002 conditions of approval, that all roads and most parks will be constructed by the developer and then dedicated to the City of Cle Elum; small “pocket parks” within each neighborhood will be owned and maintained by a homeowner’s association, however. As a result, the city will assume responsibility for maintaining most park facilities, roads and trails, leading to cost impacts for public works functions.

Impacts to road, park and trail maintenance services are modeled based on the addition of lane miles to the city’s road network and acreage of parks (including trails), with costs apportioned as development occurs. The modeling uses the 2024 budget for maintaining existing road and park facilities as the baseline for estimating the future maintenance costs associated with the newly dedicated assets.

The fiscal analysis only addresses general fund services that are supported by taxes. It does not include enterprise services, such as sewer and water utilities, that are supported by user fees (i.e., users themselves support the cost of the service), and does not address capital facility needs.

EIS Addendum - 2024 Bullfrog Flats Proposal Fiscal Impacts

Impacts to the City of Cle Elum

Tax Revenues

The City of Cle Elum is the local service provider for police, fire, public works, parks, and other local services and it supports these services through a range of taxes. Major tax sources include property taxes, sales and use taxes, state shared motor vehicle fuel tax & liquor board/taxes, business license fees, and Real Estate Excise Tax (REET). A summary of the sources and nature of tax revenues (restricted or unrestricted, one-time or recurring), and current rates, levy limits and assumptions for each tax is provided in the Fiscal Appendix.

Public Service Impacts

Refer to the discussion of levels of service in the section of this Addendum for additional information

Police Service

The prior environmental documents have considered alternative levels of service for police service. The 2002 development agreement/conditions of approval identify a level of service standard of two officers per 1,000 residents. To provide a conservative analysis, this updated assessment uses an adjusted level-of-service standard of three officers per 1,000 residents. This LOS is not formally adopted but has been used to support Police Department operations in recent City budget cycles. It is based on the output of a planning model used by the Cle Elum Police Department [the ICMA model], which considers a number of factors in addition to population. Under this standard, which is used in the fiscal update, there is a need for 6.8 officers at buildout and occupancy. The analysis posits that if net revenues are positive with the costs of the higher level of service, then costs would be lower and net revenues would be more positive if a lower level of service (two officers per 1000 per the 2002 conditions of approval) is applicable.

The timing of staff hires based on this LOS is as follows, and reflects a city goal to hire new staff in advance of demand (i.e., prior to completion and occupancy of units).

- One third of the FTEs are added at the beginning of development in 2026
- One third of the FTEs are once the residential project reaches 33.3% of buildout in 2029
- The last third of the FTEs are once the project reaches 66.3% of buildout in 2032

Labor costs for a police officer (salary and benefits) are identified in **Appendix F**. An annual non-labor cost of \$10,000 per full-time equivalent (FTE) to account for police academy training, annual training, radio, equipment, vehicle, and other overhead costs. All costs are

inflated to the year of incurrence at a rate of 3.0% to account for inflation and other salary step increases.

It is noted that the city has a policy of procuring a vehicle for every new police officer hired. This includes purchasing or leasing the vehicle, installing specialized equipment, covering fuel costs, and providing annual maintenance. Depending on how the city secures these services, estimated annual costs for a vehicle could range from \$10,000 to \$20,000 per vehicle. While the current analysis allocates \$10,000 per FTE for non-labor costs, including equipment, training, and vehicle expenses, this amount may need to be adjusted based on how the department operates. With the addition of 6.8 FTEs by the commencement of the final building increment installment in 2032, this could result in an additional \$70,000 to \$140,000 annually for vehicle-related expenses including vehicle leases. Lease expenses are variable depending on vehicle model and options, and similar considerations.

Fire Service

This updated assessment uses an adjusted, but unadopted, de facto city level-of-service standard of 1.5 full time firefighters per 1,000 residents. Firefighters are added based on the firefighter-to-population standard. (Refer to the discussion of standards in the 2021 SEIS Public Services section.) At this LOS, 3.4 full time firefighters would be required at buildout. The timing of these staff hires are as follows based on guidance from the city:

- One third of the FTEs are added at the beginning of development in 2026. (Note that the fire department may prefer that the first FTE is available as soon as clearing begins in 2025.);
- One third of the FTEs are added once the residential project reaches 33.3% of buildout in 2029; and
- The last third of the FTEs are added once the project reaches 66.3% of buildout in 2032.

Labor costs (salary and benefits) for a firefighter are identified in the Fiscal Appendix. The following assumptions are used to approximate the cost of a firefighter. An annual non-labor cost of \$5,000 per full-time equivalent to account for training, equipment, and other overhead costs. (Training costs for volunteer fire-fighters is not included). All costs are inflated to the year of incurrence at a rate of 3.0%.

Note that the fiscal analysis does not account for costs associated with capital equipment, fire service vehicles, such as the planned purchase of a tactical tender, or facility upgrades. The analysis also assumes a phased approach to staff training and hiring (for police and fire department staff) in synch with construction and occupancy, and an initial lag in revenue generation. To the extent that some additional staff may be needed before new project-related revenues are available, the recommended shortfall mitigation agreement with Bullfrog Flats could include a system of advance payments and credits, or the City would need to find other funds to address these timing needs.

It is also noted that the 2002 condition of approval related to meet fire service needs with two trained volunteers as an alternative to each one full time firefighter. This option may be exercised by the fire chief based on departmental plans and needs. Service costs would be reduced proportionately if volunteer firefighter are engaged.

Public Works

Street Maintenance

The 2024 Bullfrog Flats Proposal assumes that all roads, parks and other required infrastructure will be privately constructed and dedicated to the city and will require the city's public works department to spend public dollars on their maintenance and upkeep.

Street facility maintenance is modeled as follows: Bullfrog Flats has preliminarily identified the number of lane miles it expects to construct to serve the internal needs of the project. These lane miles are added to the city's development base at the same rate as housing units and population growth. To estimate the cost of maintaining these roads after they are dedicated to the city, the analysis uses the 2024 budget for the city's street fund, focusing specifically on street maintenance and administration. The budget is allocated across the city's current lane miles, as documented in the city's comprehensive plan, to calculate a maintenance cost per lane mile. This per-mile cost is then applied to the lane miles constructed by Bullfrog Flats as part of its development. The following assumptions are used to approximate the cost for park maintenance:

- Bullfrog Flats has preliminarily estimated that it will build 11.4 lane miles of roads within the area.
- The 2024 annual road maintenance is estimated at \$15,900 per lane mile.
- All costs are inflated to the year of incurrence at a rate of 3.0%.

The fiscal analysis does not include acquisition of capital equipment or vehicles or facility upgrades. The 2002 public works conditions of approval, however, identifies project-related needs for several capital improvements, including a street sweeper, a snow plow, a front-end loader, a dump truck-sander, a mower, unspecified equipment for snow removal on pedestrian bike trails in the public right-of-way, and a four-bay lean-to storage facility for the specified vehicles and equipment. There are questions, however, whether such needs are specifically caused by the Proposal or are in response to general city-wide demand and growth, and/or how to determine Bullfrog Flat's proportional share of capital needs. The monitoring and shortfall mitigation program recommended in this would revisit these questions.

Park Facility Maintenance

The Bullfrog Flats application identifies public park acreage it would develop and dedicate to the city. Although there is currently no precise timetable for the park development, this analysis assumes that park acreage is added at the same rate as the project's housing units and population growth. To estimate the cost of maintaining these parks once dedicated to

the city, the analysis uses the 2024 budget for the city's parks fund, focusing specifically on park maintenance and administration. The budget is allocated across the city's existing park acreage, as documented in the city's comprehensive plan, to calculate a maintenance cost per acre. This per-acre cost is then applied to the park acreage in the Bullfrog Flats Project. The following assumptions are used to approximate the cost for park maintenance:

- Bullfrog Flats has preliminarily estimated that it will build 24.5 acres of public parks, which includes an 18-acre active park with ballfields. For purposes of analysis, an additional approximate 6.5 -acre public park that is being planned but has not been designed or formally proposed yet is also included. Current design concepts for the park range from active to passive recreation uses or a combination of both.
- Bullfrog Flats has preliminarily estimated it will build 10 miles of trails that will also need to be maintained by the city. This length of trail is converted to an equivalent acreage (~ 6 acres) for this analysis.
- The 2024 annual park maintenance cost per acre is estimated at \$612 per acre. Depending on the use, more active uses could have higher costs and more passive uses, lower costs.
- This analysis does not include any park related income in the form of rentals or concessions because the park concepts are still in the early planning phase.
- All costs are inflated to the year of incurrence at a rate of 3.0%

Fiscal Impacts

Cost Impacts

This section summarizes the projected costs for the City of Cle Elum under the two scenarios for Bullfrog Flats business park discussed above. The analysis focuses on the key areas of police, fire, street maintenance, and park maintenance. Each alternative's projected costs are broken down by type of service, offering a clear comparison of the fiscal impacts on the city's police, fire, street maintenance, and park maintenance functions. Overall, the cost impacts for both scenarios are projected to be the same because police and fire costs are allocated on a per capita basis, and there is no population associated with the business park component. Additionally, the costs for street and park maintenance are determined based on the amount of physical assets, such as lane miles and park acreage, and are not directly influenced by population or employment levels. This ensures that the fiscal analysis remains consistent regardless of the amount of business park development.

Table 3.9-3 shows the cost impact of the scenarios. In the first table, the scenario that estimates the cumulative costs for the City of Cle Elum from 2028 to 2040 associated with police, fire, street maintenance, and park maintenance under the proposed development. Total annual costs increase steadily to \$1.9 million by 2040. The largest cost drivers are police services, followed by fire services and street maintenance, with park maintenance representing a smaller but consistent share of the total costs. These projections reflect the anticipated service demands resulting from buildout.

Table 3.9-3
Summary of Cost Impacts for Cle Elum

	Police	Fire	Street Maintenance	Park Maintenance	Total
2025	\$0	\$0	\$0	\$0	\$0
2026	\$230,000	\$95,000	\$0	\$0	\$324,000
2027	\$245,000	\$100,000	\$19,000	\$2,000	\$365,000
2028	\$260,000	\$105,000	\$39,000	\$4,000	\$408,000
2029	\$536,000	\$216,000	\$82,000	\$8,000	\$842,000
2030	\$561,000	\$224,000	\$105,000	\$11,000	\$902,000
2031	\$587,000	\$233,000	\$130,000	\$13,000	\$963,000
2032	\$883,000	\$355,000	\$144,000	\$15,000	\$1,397,000
2033	\$914,000	\$367,000	\$159,000	\$16,000	\$1,456,000
2034	\$946,000	\$379,000	\$175,000	\$18,000	\$1,518,000
2035	\$979,000	\$391,000	\$192,000	\$20,000	\$1,582,000
2036	\$1,014,000	\$404,000	\$209,000	\$22,000	\$1,649,000
2037	\$1,049,000	\$418,000	\$228,000	\$23,000	\$1,718,000
2038	\$1,086,000	\$431,000	\$247,000	\$25,000	\$1,790,000
2039	\$1,119,000	\$444,000	\$254,000	\$26,000	\$1,844,000
2040	\$1,152,000	\$458,000	\$262,000	\$27,000	\$1,899,000

Source: ECONorthwest calculations, 2024.

Revenue Impacts

Table 3.9-4 summarizes Scenario 1, which assumes development of 450,000 gross square feet of business park, and projects total annual revenues for the City of Cle Elum to increase steadily from \$550,000 in 2026 to \$2.9 million by 2040. Key revenue drivers include property taxes, and sales tax from construction, which peaks at \$830,000 in 2028. Other significant contributions come from utility taxes, state-shared taxes, and real estate excise tax (REET), reflecting ongoing development activity and property transfers. These revenues illustrate the combined fiscal impact of both the residential and business park components of the Bullfrog Flats Project over the study period.

Table 3.9-4
Bullfrog Flats Project Scenario 1 – Summary of Revenue Impacts for Cle Elum

	Property Tax	Sales Tax on Construction	Sales Tax Ongoing	Utility Taxes	Criminal Justice & Public Safety	State Shared Taxes	Business License Fees	REET	Total
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$519,000	\$0	\$32,000	\$0	\$0	\$0	\$0	\$550,000
2027	\$126,000	\$534,000	\$4,000	\$65,000	\$31,000	\$10,000	\$1,000	\$210,000	\$981,000
2028	\$255,000	\$829,000	\$7,000	\$134,000	\$64,000	\$21,000	\$1,000	\$232,000	\$1,544,000
2029	\$453,000	\$492,000	\$13,000	\$169,000	\$133,000	\$44,000	\$1,000	\$255,000	\$1,561,000
2030	\$573,000	\$699,000	\$17,000	\$213,000	\$171,000	\$57,000	\$1,000	\$278,000	\$2,009,000
2031	\$739,000	\$499,000	\$22,000	\$237,000	\$210,000	\$70,000	\$3,000	\$302,000	\$2,083,000
2032	\$859,000	\$309,000	\$27,000	\$255,000	\$234,000	\$78,000	\$4,000	\$322,000	\$2,088,000
2033	\$937,000	\$318,000	\$29,000	\$274,000	\$258,000	\$86,000	\$4,000	\$347,000	\$2,254,000
2034	\$1,016,000	\$328,000	\$32,000	\$294,000	\$284,000	\$94,000	\$4,000	\$373,000	\$2,426,000
2035	\$1,098,000	\$338,000	\$35,000	\$314,000	\$311,000	\$103,000	\$4,000	\$399,000	\$2,603,000
2036	\$1,181,000	\$617,000	\$38,000	\$345,000	\$339,000	\$113,000	\$4,000	\$426,000	\$3,065,000
2037	\$1,323,000	\$636,000	\$44,000	\$377,000	\$369,000	\$123,000	\$6,000	\$454,000	\$3,332,000
2038	\$1,468,000	\$0	\$50,000	\$387,000	\$401,000	\$133,000	\$8,000	\$483,000	\$2,929,000
2039	\$1,483,000	\$0	\$52,000	\$397,000	\$413,000	\$137,000	\$8,000	\$463,000	\$2,952,000
2040	\$1,498,000	\$0	\$53,000	\$407,000	\$425,000	\$141,000	\$8,000	\$315,000	\$2,849,000

Source: ECONorthwest calculations, 2024.

In Scenario Two, which assumes no business park development before 2037, projected revenues for the City of Cle Elum grow steadily but are lower than in Scenario One. Total revenues begin at \$567,000 in 2025 and level off at \$2,909,000 by 2040.

Key differences compared to Scenario One include:

- Slower growth of property taxes, reflecting the absence of business park contributions.
- Sales Taxes: Sales tax from construction is lower overall due to the reduced scope of development.
- Business license fees are minimal or absent.
- Utility taxes are lower, reflecting fewer commercial utility users.
- REET: Real estate excise tax revenues are also reduced due to fewer property transactions associated with commercial properties.

This scenario demonstrates the fiscal impact of residential development alone, excluding additional contributions from business park-related activity. Overall, Scenario Two produces less revenue than Scenario One but still significantly contributes to Cle Elum's tax revenue growth.

Table 3.9-5
Bullfrog Flats Project Scenario 2 – Summary of Revenue Impacts for Cle Elum

	Property Tax	Sales Tax on Construction	Sales Tax Ongoing	Utility Taxes	Criminal Justice & Public Safety	State Shared Taxes	Business License Fees	REET	Total
2025	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2026	\$0	\$450,000	\$0	\$29,000	\$0	\$0	\$0	\$0	\$479,000
2027	\$109,000	\$464,000	\$3,000	\$60,000	\$31,000	\$10,000	\$0	\$210,000	\$887,000
2028	\$221,000	\$829,000	\$6,000	\$129,000	\$64,000	\$21,000	\$0	\$232,000	\$1,503,000
2029	\$419,000	\$492,000	\$12,000	\$164,000	\$133,000	\$44,000	\$0	\$255,000	\$1,519,000
2030	\$538,000	\$507,000	\$15,000	\$201,000	\$171,000	\$57,000	\$0	\$278,000	\$1,767,000
2031	\$660,000	\$300,000	\$19,000	\$218,000	\$210,000	\$70,000	\$0	\$302,000	\$1,779,000
2032	\$734,000	\$309,000	\$21,000	\$235,000	\$234,000	\$78,000	\$0	\$322,000	\$1,933,000
2033	\$810,000	\$318,000	\$24,000	\$254,000	\$258,000	\$86,000	\$0	\$347,000	\$2,097,000
2034	\$888,000	\$328,000	\$27,000	\$273,000	\$284,000	\$94,000	\$0	\$373,000	\$2,267,000
2035	\$968,000	\$338,000	\$29,000	\$293,000	\$311,000	\$103,000	\$0	\$399,000	\$2,442,000
2036	\$1,050,000	\$348,000	\$32,000	\$314,000	\$339,000	\$113,000	\$0	\$426,000	\$2,623,000
2037	\$1,134,000	\$358,000	\$35,000	\$336,000	\$369,000	\$123,000	\$0	\$454,000	\$2,809,000
2038	\$1,219,000	\$0	\$39,000	\$345,000	\$401,000	\$133,000	\$0	\$483,000	\$2,619,000
2039	\$1,232,000	\$0	\$40,000	\$354,000	\$413,000	\$137,000	\$0	\$463,000	\$2,638,000
2040	\$1,245,000	\$0	\$41,000	\$363,000	\$425,000	\$141,000	\$0	\$315,000	\$2,530,000

Source: ECONorthwest calculation, 2024.

Table 3.9-6 highlights the comparison between annual costs and non-restricted revenues for the City of Cle Elum with Scenario 1, while also tracking the cumulative impacts of annual surpluses or deficits and restricted revenues, such as the real estate excise tax (REET). Key highlights include:

- **Annual Costs vs. Revenues:**
 - Total costs reflecting increasing service demands as development progresses.
 - Non-restricted revenues grow.
- **Annual Surplus/Deficit:**
 - The city experiences substantial annual surpluses throughout the study period. By 2040, the annual surplus moderates to \$575,000 as costs and revenues stabilize.
- **Cumulative Impact:**
 - Cumulative surpluses steadily grow, reaching \$9.1 million by 2040, illustrating the long-term fiscal benefit of the development.
 - Restricted revenues, primarily from REET, also accumulate significantly, growing to \$5.4 million by 2040. These funds are earmarked for specific purposes, such as infrastructure investments.

Table 3.9-6
Scenario 1 – Surplus/Deficit of Costs and Revenues for Cle Elum

	Total Costs	Total Non-Restricted Revenues	Annual Surplus/Deficit	Cumulative Impact	Other Cumulative Restricted Revenues
2025	\$0	\$0	\$0	\$0	\$0
2026	\$324,000	\$550,000	\$226,000	\$226,000	\$0
2027	\$365,000	\$766,000	\$401,000	\$627,000	\$215,000
2028	\$408,000	\$1,302,000	\$894,000	\$1,521,000	\$457,000
2029	\$842,000	\$1,285,000	\$443,000	\$1,964,000	\$733,000
2030	\$902,000	\$1,704,000	\$802,000	\$2,766,000	\$1,038,000
2031	\$963,000	\$1,748,000	\$785,000	\$3,551,000	\$1,373,000
2032	\$1,397,000	\$1,729,000	\$332,000	\$3,883,000	\$1,732,000
2033	\$1,456,000	\$1,866,000	\$410,000	\$4,293,000	\$2,120,000
2034	\$1,518,000	\$2,008,000	\$490,000	\$4,783,000	\$2,538,000
2035	\$1,582,000	\$2,155,000	\$573,000	\$5,356,000	\$2,986,000
2036	\$1,649,000	\$2,585,000	\$936,000	\$6,292,000	\$3,466,000
2037	\$1,718,000	\$2,820,000	\$1,102,000	\$7,394,000	\$3,978,000
2038	\$1,790,000	\$2,383,000	\$593,000	\$7,987,000	\$4,524,000
2039	\$1,844,000	\$2,424,000	\$580,000	\$8,567,000	\$5,052,000
2040	\$1,899,000	\$2,467,000	\$568,000	\$9,135,000	\$5,434,000

Source: ECONorthwest calculation, 2024.

Overall, the analysis demonstrates that Bullfrog Flats is fiscally sustainable, generating consistent annual surpluses and significant cumulative revenues for the City of Cle Elum. The additional restricted revenues would further enhance the city’s financial capacity for targeted investments and long-term growth.

Table 3.9-7 provides the cumulative assessment for Scenario Two. While costs remain identical in both scenarios, Scenario One (including the business park) produces higher annual and cumulative revenues and surpluses, primarily due to the additional revenues associated with business park operations.

It is important to note that the assumption of no public safety costs being allocated to the business park because of the application of a population-based model may not reflect a completely realistic scenario. In practice, there will likely be some level of demand for public safety services, although it may be minimal, which cannot be accurately estimated but could have some effect on service demand and costs.

Table 3.9-7
Scenario 2 – Surplus/Deficit of Costs and Revenues for Cle Elum

	Total Costs	Total Non-Restricted Revenues	Annual Surplus/Deficit	Cumulative Impact	Other Cumulative Restricted Revenues
2025	\$0	\$0	\$0	\$0	\$0
2026	\$324,000	\$479,000	\$155,000	\$155,000	\$0
2027	\$365,000	\$672,000	\$307,000	\$462,000	\$215,000
2028	\$408,000	\$1,261,000	\$853,000	\$1,315,000	\$457,000
2029	\$842,000	\$1,243,000	\$401,000	\$1,716,000	\$733,000
2030	\$902,000	\$1,462,000	\$560,000	\$2,276,000	\$1,038,000
2031	\$963,000	\$1,444,000	\$481,000	\$2,757,000	\$1,373,000
2032	\$1,397,000	\$1,574,000	\$177,000	\$2,934,000	\$1,732,000
2033	\$1,456,000	\$1,709,000	\$253,000	\$3,187,000	\$2,120,000
2034	\$1,518,000	\$1,849,000	\$331,000	\$3,518,000	\$2,538,000
2035	\$1,582,000	\$1,994,000	\$412,000	\$3,930,000	\$2,986,000
2036	\$1,649,000	\$2,143,000	\$494,000	\$4,424,000	\$3,466,000
2037	\$1,718,000	\$2,297,000	\$579,000	\$5,003,000	\$3,978,000
2038	\$1,790,000	\$2,073,000	\$283,000	\$5,286,000	\$4,524,000
2039	\$1,844,000	\$2,110,000	\$266,000	\$5,552,000	\$5,052,000
2040	\$1,899,000	\$2,148,000	\$249,000	\$5,801,000	\$5,434,000

Source: ECONorthwest calculation, 2024.

Kittitas Hospital District #2

Kittitas County Hospital District #2 provides critical medical and emergency services to its service area, which stretches from halfway to Ellensburg to Snoqualmie Pass. The District operates Medic One ambulance services and owns the KVH Family Medicine Clinic in Cle Elum. The clinic is leased to Kittitas Valley Healthcare (Hospital District #1), which operates the Cle Elum Rural Health Clinic and an Urgent Care Clinic in the same location. The Urgent Care Clinic operates daily from 10 am to 10 pm, and the District subsidizes its operations, with subsidies totaling \$187,466 in 2020 and \$191,215 in 2021.

The District is supported by two property tax levies: one for medical clinic operations and another for EMS services (Medic One). Medic One's services are funded through a mix of property taxes and user service charges, with the latter accounting for a significant share of revenues. User charges, which represent a substantial portion of Medic One's funding, help offset its operational costs, ensuring the sustainability of its emergency services.

Tax Revenues

The hospital district collects two distinct property tax levies to fund two different services.

Property Tax – EMS Levy: The district voters passed a permanent EMS levy not to exceed \$0.25 per \$1,000 of assessed value in 2016 (before that, the levy had to be approved periodically by voters). This is a regular levy (meaning it is subject to constitutional limits) in Washington and is modelled like the provisions of the city of Cle Elum’s property tax, also a regular levy.

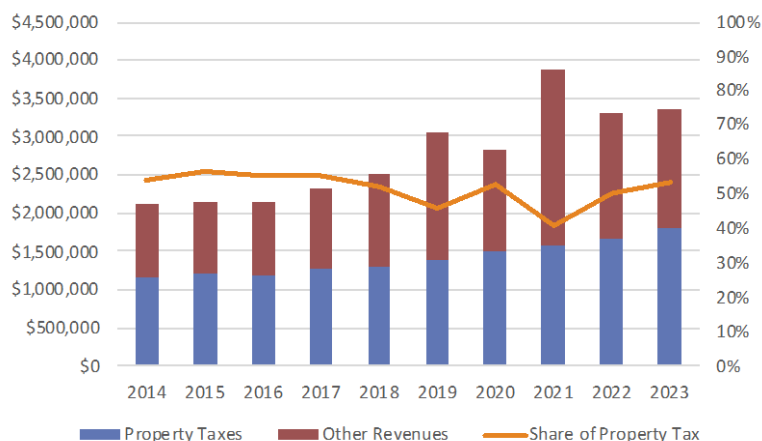
Property Tax – Regular Levy: The district uses the regular levy of up \$0.25 per \$1,000 of assessed value. This is a regular levy (meaning it is subject to constitutional limits) in Washington and is modelled like the provisions of the city of Cle Elum’s property tax, also a regular levy.

Other Revenues

Recurring revenues for Hospital District #2 primarily come from patient service fees and property taxes. The exhibit below summarizes the District’s cumulative revenues from its operating property tax levies (EMS and Hospital) and other revenue sources. In 2023, patient service fees and other revenues made up approximately 46% of the District’s total revenues.

The Hospital District has provided additional information to the City, described in the 2021 Final SEIS and 2023 SEIS Addendum, that adds context to the relationship between property taxes and service fees. According to the District, approximately 65% of its ambulance transport revenue comes from Medicare and Medicaid, which have fixed reimbursement rates that do not adjust for increases in transport fees or costs. This limits the District’s ability to offset rising expenses through higher transport rates. Additionally, the District noted that many of its calls for service do not result in a transport, and reimbursement is only possible for calls that lead to a transport. Furthermore, the District has indicated that growth in its property tax levy has not kept pace with rising expenses, resulting in an inadequate subsidy and financial strain on service delivery.

Table 3.9-8
Summary of Kittitas Hospital District #2 Revenues



Source: Washington State Auditor Financial Intelligence Tool, 2024.

Service Impacts

The fiscal analysis estimated costs by projecting the future personnel required to meet increased demand from the project. These personnel costs were based on a pro-rata extrapolation of current staffing levels relative to the service area's population. While this method provides a reasonable baseline for environmental review purposes, it does not account for potential economies of scale, unique service characteristics, or the possibility that staffing needs may not grow proportionally with population, all of which could reduce costs. This issue and the complexities of revenue sources underscore the uncertainty surrounding the District's ability to meet future demands under its current revenue structure.

Medic One

The impact analysis applies the same assumptions and methodology as the public service analysis in the 2021 SEIS and 2023 SEIS Addendum. For EMS services, the ratio of EMTs and paramedics to the current service population is used to estimate the additional staffing needed due to population growth from the Bullfrog Flats Project.

The previous analysis assumed a staffing level of nine EMTs and 11 paramedics to serve a population of 4,675. Using this ratio, the projected population growth from the Bullfrog Flats Project results in the need for an additional 4.4 EMTs and 5.4 paramedics.

Assumptions used to approximate the cost of staff (salary and benefits) are identified in the Fiscal Conditions Report (**Appendix F**).

Cle Elum Clinic

For clinic-related services provided by Kittitas County Hospital District #2, the updated analysis applies the level-of-service standards identified in the 2020/2021 SEIS and 2023 SEIS Addendum. These standards include one physician, eight physician assistants (APC), and six registered nurses (RN) per a service population of 4,675. This ratio is used to estimate the additional staffing needs required to accommodate the incremental population growth resulting from the Bullfrog Flats Project.

This analysis projects that the incremental population growth from the Bullfrog Flats Project will result in the need for an additional 0.5 physicians, 3.9 physician assistants, and 2.9 registered nurses to maintain the established level of service standards for clinic-related services provided by Kittitas County Hospital District #2.

Detailed assumptions regarding salaries and benefits are included in the Fiscal Conditions Report (**Appendix F**).

Fiscal Impact

The cost and revenue impacts of Bullfrog Flats are summarized in **Tables 3.9-9** and **3.9-10** below for both the Medic One and Clinic services. Both services support its services through a combination of property taxes and charges for its services. The Cle Elum Clinic is run by

Kittitas Valley Healthcare (Hospital District #1) but supported in part by Hospital District 2 through their ownership of the facility. Results below show only the property tax component relative to increased personnel costs and, therefore, does not present a complete or accurate picture of future fiscal conditions. As discussed further below, the analysis is challenging because of several factors, including lack of data and uncertainties unrelated to the Bullfrog Flats Project.

The table compares personnel costs and EMS levy revenues under two scenarios. In both scenarios, personnel costs significantly exceed the revenue generated by the EMS levy, with the gap widening over time as service demands increase. Scenario 2 revenues is lower due to absence of the Business Park. However, in neither scenario are the EMS levy revenues sufficient to cover the rising personnel costs, indicating a reliance on patient service fees and other available funding sources.

Table 3.9-9
Bullfrog Flats Project - Summary of Costs and Revenues for EMS Medic One

Scenario 1	Personnel Costs	EMS Levy	Scenario 2	Personnel Costs	EMS Levy
2025	\$0	\$0	2025	\$0	\$0
2026	\$0	\$0	2026	\$0	\$0
2027	\$93,000	\$9,000	2027	\$93,000	\$8,000
2028	\$192,000	\$19,000	2028	\$192,000	\$17,000
2029	\$400,000	\$34,000	2029	\$400,000	\$31,000
2030	\$514,000	\$43,000	2030	\$514,000	\$40,000
2031	\$634,000	\$55,000	2031	\$634,000	\$49,000
2032	\$704,000	\$64,000	2032	\$704,000	\$55,000
2033	\$778,000	\$70,000	2033	\$778,000	\$61,000
2034	\$856,000	\$76,000	2034	\$856,000	\$66,000
2035	\$938,000	\$82,000	2035	\$938,000	\$72,000
2036	\$1,023,000	\$88,000	2036	\$1,023,000	\$78,000
2037	\$1,113,000	\$99,000	2037	\$1,113,000	\$85,000
2038	\$1,208,000	\$109,000	2038	\$1,208,000	\$91,000
2039	\$1,244,000	\$111,000	2039	\$1,244,000	\$92,000
2040	\$1,281,000	\$112,000	2040	\$1,281,000	\$93,000

Source: ECONorthwest calculation, 2024.

Table 3.9-10
Bullfrog Flats Project - Summary of Costs and Revenues for Cle Elum Clinic

Scenario 1	Personnel Costs	Property Tax	Scenario 2	Personnel Costs	Property Tax
2025	\$0	\$0	2025	\$0	\$0
2026	\$0	\$0	2026	\$0	\$0
2027	\$170,000	\$10,000	2027	\$170,000	\$9,000
2028	\$350,000	\$20,000	2028	\$350,000	\$18,000
2029	\$731,000	\$36,000	2029	\$731,000	\$34,000
2030	\$938,000	\$46,000	2030	\$938,000	\$43,000
2031	\$1,158,000	\$59,000	2031	\$1,158,000	\$53,000
2032	\$1,286,000	\$69,000	2032	\$1,286,000	\$59,000
2033	\$1,421,000	\$75,000	2033	\$1,421,000	\$65,000
2034	\$1,562,000	\$81,000	2034	\$1,562,000	\$71,000
2035	\$1,711,000	\$88,000	2035	\$1,711,000	\$77,000
2036	\$1,868,000	\$94,000	2036	\$1,868,000	\$84,000
2037	\$2,032,000	\$106,000	2037	\$2,032,000	\$91,000
2038	\$2,205,000	\$117,000	2038	\$2,205,000	\$97,000
2039	\$2,271,000	\$118,000	2039	\$2,271,000	\$98,000
2040	\$2,339,000	\$119,000	2040	\$2,339,000	\$99,000

Source: ECONorthwest calculation, 2024.

Assessing the fiscal impacts of Bullfrog Flats is challenging due to several uncertainties. The fiscal analysis estimates future costs based on a pro-rata extrapolation of current staffing levels relative to the service area's population. This method assumes staffing needs will grow proportionally with population increases. While this approach is reasonable for purposes of environmental review, it does not account for economies of scale, unique service characteristics, or shifts in demand patterns which may affect operational costs.

The District's challenges with cost recovery and billing sources, described in greater detail in **Appendix F**, also add to the difficulty of drawing firm conclusions. Challenges include uncertainty in demand, insurance coverage limitations, and structural funding limitations (e.g., levy lids) that affect service districts in Washington State that rely heavily on property taxes.

Ultimately, it is difficult to determine whether the Bullfrog Flats Project will improve, worsen, or have a neutral impact on the District's financial challenges. If Bullfrog Flats generates more revenues than costs, it could act as a cross-subsidy to address existing service deficiencies. Conversely, if costs exceed revenues, the project could exacerbate the District's structural funding issues.

It is noted, as discussed further in the mitigation section of this report, that the approved 2002 Bullfrog Flats UGA project was subject to a mitigation agreement between the property owner and Hospital District 2. The required mitigation was provided by Trendwest, and the legislative bodies of both the City and County took action to acknowledge the

satisfaction of mitigation for the project. The 2024 Bullfrog Flats Project is implementing the 2002 project.

Kittitas County 911 - KITTCOM

Revenues

KITTCOM is funded primarily by intergovernmental revenue as well as fees paid by emergency service subscribers (which varies by subscriber based on the dispatch service costs) and through monthly excise taxes levied on telephone lines (\$0.70 per line: land, mobile, voice over internet protocol (VOIP)).

Line Charges

The analysis uses the following phone line charge assumptions:

- Telephone tax rate remains at \$0.70 per line
- Lines per household is 2.0 and lines per employee is 0.2

911 Sales Tax

In Washington State, counties have the authority to impose a 0.2% sales tax dedicated to funding emergency communication systems and facilities, commonly referred to as the E-911 sales tax. This tax is levied on all taxable retail sales within the county and is used to support the operations and maintenance of 911 services.

In April of 2024, voters in Kittitas County approved a proposed sales and use tax increase. KITTCOM officials stated that the sales tax increase was necessary to address outdated and unreliable emergency radio systems and communications infrastructure. The funding would support major upgrades to improve system reliability and eliminate “dead zones” across the county, including areas like Snoqualmie Pass ski areas, the Cle Elum River Valley, Suncadia, and Yakima River recreational sites, where radio signals are currently weak or nonexistent.

Service Impacts

This analysis, which is similar to the methodology used in the 2021 SEIS and 2023 Addendum fiscal studies, uses the number of dispatchers per service area population to determine a de facto level of service, which is then applied to the estimated population of the Bullfrog Flats Project. Specifically, it is assumed there are 15 dispatchers serving a population of 47,200. Applying this ratio to the projected population growth at the Bullfrog Flats Project results in an estimated need for 0.8 dispatchers at full buildout.

Information about dispatcher salaries is contained in the **Appendix F**.

Fiscal Impact

Table 3.9-11 below outlines the cost impacts of the Proposal on KITTCOM. Recurring revenues for the agency primarily come from intergovernmental transfers, fees paid by emergency service subscribers, and a monthly tax on telephone lines. Residents of the

Bullfrog Flats Project are expected to contribute similar line fees per household as current residents of the city and the district overall. The table compares dispatch costs and line revenues under two scenarios. In Scenario 1, line revenues are significantly lower than dispatch costs, leading to a growing gap between expenses and revenue as the service area expands. In Scenario 2, line revenues are down with no business contributions, resulting in a slightly larger misalignment between costs and revenues.

While the projected new staffing costs exceed the revenues generated from phone line charges, this analysis acknowledges that KITTCOM has historically balanced its budget with subscriber fees. Historically, these additional funding sources have been adjusted to meet growing financial needs and could be restructured again in the future. As such, relying solely on line charge revenues provides an incomplete representation of the agency's fiscal condition. This analysis highlights that a portion of the fiscal surplus generated for the City of Cle Elum could potentially be used as subscriber fees to support KITTCOM in addressing incremental demands on call volume and dispatch services.

The recently approved 911 sales tax is expected to generate significant revenue for Kittitas County, which will be directed to KITTCOM. It is unclear at this time whether these sales tax revenues can be allocated to fund staffing of dispatch services, which are typically supported by line revenues and membership fees from participating public safety agencies, as well as to upgrades to emergency communication equipment. Contributions from Bullfrog Flats in the form of substantial construction and ongoing retail spending will enhance sales tax revenues at the 0.2% rate.

Table 3.9-11
Bullfrog Flats Project - Summary of Costs and Line Revenues for KITTCOM

Scenario 1	Dispatch Costs	Line Revenues	911 Sales Tax	Scenario 2	Dispatch Costs	Line Revenues	911 Sales Tax
2025	\$0	\$0	\$0	2025	\$0	\$0	\$0
2026	\$0	\$0	\$120,000	2026	\$0	\$0	\$110,000
2027	\$9,000	\$2,000	\$130,000	2027	\$9,000	\$2,000	\$110,000
2028	\$18,000	\$5,000	\$200,000	2028	\$18,000	\$5,000	\$200,000
2029	\$38,000	\$10,000	\$120,000	2029	\$38,000	\$10,000	\$120,000
2030	\$49,000	\$12,000	\$170,000	2030	\$49,000	\$12,000	\$120,000
2031	\$60,000	\$15,000	\$120,000	2031	\$60,000	\$14,000	\$80,000
2032	\$67,000	\$16,000	\$80,000	2032	\$67,000	\$16,000	\$80,000
2033	\$74,000	\$17,000	\$80,000	2033	\$74,000	\$17,000	\$80,000
2034	\$81,000	\$19,000	\$80,000	2034	\$81,000	\$18,000	\$80,000
2035	\$89,000	\$20,000	\$90,000	2035	\$89,000	\$19,000	\$90,000
2036	\$97,000	\$21,000	\$150,000	2036	\$97,000	\$20,000	\$90,000
2037	\$105,000	\$22,000	\$160,000	2037	\$105,000	\$21,000	\$90,000
2038	\$114,000	\$23,000	\$10,000	2038	\$114,000	\$22,000	\$10,000
2039	\$117,000	\$24,000	\$10,000	2039	\$117,000	\$22,000	\$10,000
2040	\$121,000	\$24,000	\$10,000	2040	\$121,000	\$22,000	\$10,000

Source: ECONorthwest calculation, 2024.

Cle Elum-Roslyn School District

Tax Revenues

Property Tax

In 2019, maintenance and operations levies proposed by local school districts and approved by voters were replaced by enrichment levies as part of the state's McCleary resolution. Enrichment levies are capped at the lesser of \$1.50 per \$1,000 of assessed value or \$2,500 per full-time equivalent student. For taxes due in 2020 and beyond, the levy cap for voter-approved enrichment levies has increased. Enrichment levies are capped at the lesser of two limits for districts with less than 40,000 full-time students (which would include Cle Elum-Roslyn School District):

- \$2.50 per \$1,000 of assessed value, or
- \$2,500 per full-time equivalent student, adjusted by inflation for taxes due in 2021 and later.

Since the district's enrichment levy is lower than the \$2.50 threshold, the levy is estimated on the \$2,500 per full-time equivalent student basis (adjusted for inflation at 3% a year). For the analysis, households are translated into students using the district student generation rate and the incremental levy impact is computed by the growth in students coming from the Bullfrog Flats Project.

Service Impacts

Teachers

The estimate for the number of teachers required follows the same methodology as the analysis in the previous SEPA documents. A student generation rate of 0.25 students per household, provided by the district and used in the 2023 SEIS Addendum is applied to estimate the number of students, which is then converted into a corresponding teacher requirement using a service ratio of 14.8 students per teacher. Based on this approach, it is estimated that 22.5 teachers will be needed at full buildout of the development.

Assumptions regarding salaries and benefits are included in **Appendix F**.

Buses

The Public Services analysis in the 2023 SEIS Addendum estimated the need for a new bus at a rate 45 to 60 students per bus. At that rate applied to the student population of 334, there is need for 5.6 to 7.4 buses. This analysis assumes reasonable estimate for a new diesel bus is \$150,000 per vehicle based on web search for new school buses in 2024.

Fiscal Impact

Table 3.9-12 below summarizes the cost impact of the Bullfrog Flats Project. The table compares teacher costs to enrichment levy revenues under two scenarios, illustrating that

costs exceed enrichment levy revenues across the timeline. However, the School District also benefits from intergovernmental funding, primarily through state support, which makes up over 75% of its total revenue and is expected to scale with increased service demands. These additional funding sources are critical in offsetting the gap between costs and levy revenues. The analysis assumes that state and federal support will continue to adjust proportionally to meet service needs. Additionally, the enrichment levy impact per student from the development will be the same as for existing students in the district, in accordance with changes implemented following the McCleary resolution.

Table 3.9-12
Revised Proposal - Summary of Costs for the School District

Scenario 1	Teacher Costs	Enrichment Levy	Scenario 2	Teacher Costs	Enrichment Levy
2025	\$0	\$0	2025	\$0	\$0
2026	\$0	\$0	2026	\$0	\$0
2027	\$313,000	\$130,000	2027	\$313,000	\$130,000
2028	\$644,000	\$268,000	2028	\$644,000	\$268,000
2029	\$1,344,000	\$559,000	2029	\$1,344,000	\$559,000
2030	\$1,726,000	\$718,000	2030	\$1,726,000	\$718,000
2031	\$2,130,000	\$886,000	2031	\$2,130,000	\$886,000
2032	\$2,366,000	\$984,000	2032	\$2,366,000	\$984,000
2033	\$2,614,000	\$1,087,000	2033	\$2,614,000	\$1,087,000
2034	\$2,874,000	\$1,196,000	2034	\$2,874,000	\$1,196,000
2035	\$3,149,000	\$1,310,000	2035	\$3,149,000	\$1,310,000
2036	\$3,436,000	\$1,429,000	2036	\$3,436,000	\$1,429,000
2037	\$3,739,000	\$1,555,000	2037	\$3,739,000	\$1,555,000
2038	\$4,056,000	\$1,687,000	2038	\$4,056,000	\$1,687,000
2039	\$4,178,000	\$1,738,000	2039	\$4,178,000	\$1,738,000
2040	\$4,303,000	\$1,790,000	2040	\$4,303,000	\$1,790,000

Source: ECONorthwest calculation, 2024.

The cost of needed buses is estimated between \$830,000 and \$1.1 million. There is state funding for the purchase of school buses, but it typically does not cover the full cost of a school bus.

It is noted, as discussed further in the mitigation section of this report, that Trendwest, the 2002 Bullfrog Flats project property owner, executed a mitigation agreement with the School District that included dedication of land for a school site, and payment for portables, school buses, and some administrative costs to address anticipated impacts of the UGA development. The agreement states that mitigation would be considered to be satisfied when the assessed value of the Suncadia Resort and the UGA properties together exceeded \$750,000. Assessed value is more than double that amount and mitigation is, therefore, considered satisfied based on the terms of the agreement.

Recommended Mitigation Measures

This section recommends mitigation measures for the potential fiscal impacts identified in the updated fiscal analysis. Based on the results of the updated analysis, which projects a positive fiscal balance to the City of Cle Elum through the analysis period, some adopted conditions of approval are no longer accurate or necessary and could be revised or eliminated. Additionally, as discussed further below, some mitigation agreements with non-city service providers for the 2002 Bullfrog Flats UGA project have been performed, and thus additional mitigation for these providers is not recommended or warranted.

The primary mitigation measures recommended for the Bullfrog Flats Project at this time are the following:

- (1) *a monitoring program* to monitor project-related costs and revenues to the City of Cle Elum at defined intervals to verify that the assumptions of the fiscal analysis are accurate and that the fiscal balance is positive. The recommended monitoring program, including accounting procedures, could be performed by City staff and/or a financial consultant hired by the City; and
- (2) *a shortfall agreement* with Bullfrog Flats that would require payments by the applicant to make up any actual revenue deficits identified through the monitoring program.

Recommended Measures to Mitigate Fiscal Impacts

City of Cle Elum

This updated analysis calculates net fiscal impacts for the city of Cle Elum from the proposed Bullfrog Flats Project and identifies the following:

- **Scenario 1 (450,000 square feet business park by 2037):**
 - A cumulative net surplus of \$9.9 M by 2040 to cover police, fire, parks, and roads costs.
 - An additional cumulative surplus of \$6.0 million in restricted revenues.
- **Scenario 2 (0 square feet business park by 2037):**
 - A cumulative net surplus of \$6.0 M by 2040 to cover police, fire, parks, and roads costs.
 - An additional cumulative surplus of \$6.0 million in restricted revenues.

Based on this analysis, mitigation for fiscal impacts to the City of Cle Elum is not anticipated to be necessary to maintain the fiscal balance of the underlying impacted enterprise.

As noted previously, the fiscal analysis is focused primarily on staffing needs associated with the Proposal and does not specifically address all needed equipment or facility upgrades to accommodate the additional staff. Examples of equipment and facilities that will be needed by city departments to provide service to Bullfrog Flats and that are not accounted for on

the cost side include additional police vehicles; minor physical improvements to the police station and fire station to accommodate the additional full-time staff; a new fire service vehicle (tactical tender); and various equipment and vehicles for city-wide maintenance. It is not always clear, however, whether or to what extent needed equipment is specifically attributable to Bullfrog Flats or to the City as a whole, and whether costs attributable to Bullfrog Flats should be calculated as a proportional share of the total. In addition, some larger equipment would be financed through property tax levies, and Bullfrog Flats residents would thereby pay a proportional share of costs via property taxes.

The estimates in this analysis are based on the best available information and reasonable assumptions, but they are inherently uncertain. Economic conditions are dynamic, and economic shocks—whether positive or negative—are difficult to predict in terms of timing, direction, magnitude, or duration. The city's fiscal performance will be significantly influenced by these economic fluctuations, as well as by actions taken by federal, state, and local policymakers.

Given the uncertainty in forecasting long-term fiscal impacts, a *monitoring program* is recommended. The assumptions used in this analysis should be reviewed and updated, as appropriate, at the following intervals: (1) following completion and occupancy of the first 3 phases of development (approximately 1/3 of total units); at completion of the subsequent approximate 1/3 of planned units; and (3) 1 year following completion of the development. The City could also require additional or alternative monitoring in conjunction with any extension of the Development Agreement. In addition, a *shortfall agreement* with the applicant should also be required to ensure that any unanticipated or transitory fiscal deficits are identified and mitigated.

It is also recommended that the fiscal model be run following City Council action on the Bullfrog Flats application. This would provide an opportunity to adjust the analysis as appropriate to reflect any changes in assumptions or conditions that arise from the City's decision. The costs of identified capital equipment, as identified in this section, could also be estimated in this update to determine its effects on the estimated net fiscal surplus projected in this report.

If future mitigation becomes necessary, the city could also consider measures typical in municipal budgeting, such as imposing new taxes or fees to balance the budget or adjusting public service levels to align with available revenues. It is noted, for example, that the City of Cle Elum does not currently utilize all funding mechanisms available to cities. Some available options could include implementing local option taxes (such as a voter-approved levy lid lift), introducing business and occupation taxes, or increasing existing tax rates, such as utility taxes.

Kittitas Hospital District No. 2

As noted previously and explained in the EIS Addendum, the Hospital District and the original Bullfrog Flats UGA property owner, Trendwest, executed a mitigation agreement that addressed the service-related impacts of the project. The agreement was an attachment to the 2002 Development Agreement. Subsequently, the City and County each adopted a resolution stating that the agreed upon mitigation had been performed and the agreement had been satisfied (by the adoption of Resolution No. 2007-15 by the Cle Elum City Council on August 14, 2007, and by the adoption of Resolution No. 2007-119 of the Kittitas County Board of County Commissioners on September 18, 2007). The proposed Bullfrog Flats Project is an implementing action for the approved 2002 Bullfrog Flats master site plan, and as identified in the 2024 EIS Addendum, the proposal's impacts would be the same or lower than those identified in previous SEPA documents, and for which mitigation was required. Given that required mitigation has been performed and acknowledged, no additional mitigation is identified in this updated analysis.

Cle Elum-Roslyn School District

Mitigation measures previously established for the Bullfrog Flats project (see 2002 EIS, 2021 Final SEIS), and memorialized in a mitigation agreement between the Trendwest and the School District, included donating a 35-acre site to the School District, payments by Trendwest for portable classrooms and buses to address project-specific student generation, and a one-time payment to establish a system to track student enrollment. The agreement stated that it would remain in effect until the UGA property combined with the Suncadia property reached a pre-determined level of assessed value. The agreement was included in the Development Agreement.

The agreement stipulated that these mitigation measures would remain in place until the combined developments reached an assessed valuation of \$750 million, at which point all impacts would be considered fully mitigated. This provision reflected the significant property tax revenues generated by the developments and their impact on funding prior to the McCleary decision, which subsequently altered local school levy computations.

Mitigation requirements, as identified in previous SEPA documents and the Bullfrog Flats Development Agreement have been fulfilled. Public records indicate that as of 2022, Suncadia had a taxable assessed valuation of approximately \$1.4 billion, accounting for over 30% of the School District's total assessed valuation while contributing a very small fraction of total enrollment (around 20 students during the 2021–2022 school year out of 900 total). Suncadia generates substantial local levy revenues that help reduce the property tax burden for other taxpayers in the District. Based on the terms of the original Mitigation Agreement, the school-related impacts of the Bullfrog Flats Project have already been addressed, and additional mitigation under SEPA would be duplicative.

Kittitas County 911

Projected revenues from the KITTCOM phone tax are expected to fall short of covering the costs associated with new FTEs under the Bullfrog Flats Project. This shortfall reflects KITTCOM's broader challenge: the fixed fee structure of the phone tax, combined with a declining number of household landlines, places growing financial pressure on the agency to manage costs while relying on intergovernmental revenues or subscriber fees to balance the budget.

The new 911 sales tax provides an additional funding source for equipment and operations. However, it is somewhat unclear whether these funds will be available to address dispatch service needs directly. If sales funds may be used to address staffing needs, then total revenues from the project could be sufficient to address project-generated demand, and no supplemental mitigation would be warranted. Households within the Bullfrog Flats Project would contribute at the same per-line rate as existing households in the district. It is reasonable to assume that intergovernmental revenues, including subscriber fees, would scale with population growth in the city and county. Additionally, subscriber fees could potentially be restructured to address increased funding needs as service demands evolve. To the extent that the City of Cle Elum generates fiscal surpluses from the project, these funds could help support any increases in subscriber fees that may be necessary to mitigate additional staffing costs at the dispatch level for KITTCOM. Given some uncertainty regarding use of the sales tax, additional discussion, monitoring and/or possibly a mitigation agreement between the applicant and KITTCOM should be considered.

Chapter 4

REFERENCES

Chapter 4

REFERENCES

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Chapter 5 DISTRIBUTION LIST

Agencies, Organizations, and Tribes	Contact	Position
City of Cle Elum	Matthew Lundh	Mayor
City of Cle Elum	Robert Omans	Administrator/Building Official
City of Cle Elum	Virgil Amick	Permit Tech/Office Tech
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City of Cle Elum	Christina Wollman	Contract Planner/Perteet
City of Cle Elum	Colleda Monick	Contract Planner/HLA
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City of Cle Elum	William LaRue	Water & Wastewater Plant Manager
City of Cle Elum	Robin Newcomb	Treasurer
City of Cle Elum	Debbie Lee	Clerk
City of Cle Elum	Audrey Casassa	Utility Clerk
City of Cle Elum	Aaron Barr	Acting Public Works Director
City of Cle Elum	Whitney Prosek	Office Assistant
City of Cle Elum	Rich Albo	Police Chief
City of Cle Elum	Ed Mills	Fire Chief
City of Cle Elum	Steven Harper	City Council
City of Cle Elum	Beth Williams	City Council
City of Cle Elum	Ken Ratliff	City Council
City of Cle Elum	Cassidy Buechle-Curtis	City Council
City of Cle Elum	Jerred Weis	City Council
City of Cle Elum	Audrey Malek	City Council
City of Cle Elum	Steven Cook	City Council
City of Cle Elum	Gary Berndt	Planning Commission
City of Cle Elum	Paul Kantwill	Planning Commission
City of Cle Elum	Jonathon Cornelius	Planning Commission
City of Cle Elum	Cassidy Buechle-Curtis	Planning Commission
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City of Cle Elum	Amy Pridemore	Asst. Librarian
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City of Roslyn	Jeff Adams	Mayor
City of Roslyn	Claudia Guilford	Librarian

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City of Roslyn	Bubba Simplot	Pulic Works
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Kittitas County Assessors Office	Haley Mercer	Cadastral Technician
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Kittitas County Commissioner	Cory Wright	Commissioner Dist#1
Kittitas County Commissioner	Brett Wachsmith	Commissioner Dist #3
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Kittitas County Planning Department	Chad Bala	Director
Kittitas County Public Works Department	Kelee Hodges	Environmental/Transportation Planner
Kittitas County Public Works Department	Josh Fredrickson	County Engineer
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Kittitas County Community Development Services		
Kittitas Reclamation District		
Kittitas County Solid Waste		
Kittitas County Housing Authority		
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Washington State Department of Ecology	Lori White	Critical Areas
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US Federal Highway Administration	Angel Rivera	WA Division Area Engineer
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US Forest Service	Joe Rausch	District Ranger
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The Nature Conservancy	Darcy Batura	Area Supervisor
Kittitas County Chamber of Commerce	Amy McGuffin	Executive Director
Bureau of Reclamation		
City of Cle Elum Fire Department	Ed Mills	Fire Chief
City of Roslyn Fire Department	Corrie Reagan	Fire Chief
Kittitas County Fire Marshal	Dan Young	
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Kittitas County Fire District No. 3		
Kittitas County Fire District No. 4		
Kittitas County Fire District No. 6	Chief Sinclair	Fire Chief
Kittitas County Fire District No. 7	Chief Milbert	Fire Chief
Kittitas County Fire District No. 51		
Kittitas Valley Fire and Rescue		
Kittitas County Hospital District #2	Geoff Scherer	
Kittitas County Sheriff's Office	Darren Higashima	Commander - Emergency Management
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2024 Bullfrog Flats Proposal EIS Addendum Appendices

Appendix A: Air Quality and Noise Assessment Memorandum

Appendix B: Geologic Hazards Requirements

Appendix C: Wetland Buffer Requirements

Appendix D: Transportation Report

Appendix E: Utilities Memorandums

Appendix F: Fiscal Conditions Report

Note: All appendices are available separately from the City of Cle Elum.